



# Review of EXPRA membership PRO schemes with REPAK Ireland

## Governance Focus

This review of PRO schemes and governance arrangements has drawn from both the EXPRA membership database and the individual websites of the Product Responsibility Organisations that operate within the EXPRA membership. It is intended to provide a tableau of PRO structures and governance examples, and how they relate to ownership, membership, and legislative frameworks in multiple European, South American and Canadian economies.

The purpose of this review is to assist the Governance Group of the New Zealand PPPS in making recommendations on governance arrangements for a future Plastic Product Packaging Stewardship Scheme in New Zealand.

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## Summary and Conclusions

This review of Product Responsibility Organisation (PRO) schemes and governance arrangements is drawn from both the EXPRA membership online database and the individual websites of the many national PROs. It is intended to provide a tableau of governance examples and how they relate to ownership, membership, and legislative frameworks in multiple European, South American, and Canadian economies.

The purpose of this review is to assist the Governance Group of the New Zealand PPPSS in making recommendations on governance arrangements for a future Plastic Product Packaging Stewardship Scheme in New Zealand.

The review looks at schemes operating in 29 territories from Belgium to Turkey and is structured to show basic information on: the general status of Extended Producer Responsibility (EPR) within the territory; the **Legal Basis** under which EPR is operating; a **System Description** under which the PRO/s of the territory operate; the waste **Prevention** framework under which the PRO/s operate; the **Legislation** under which the PRO/s operate; and where available the founding, ownership and **Governance** arrangements.

As expected, there is a significant variance in approaches. Some territories have highly sophisticated and have very detailed arrangements in place e.g. Sweden and Spain, while some are rather rudimentary (and smaller) in nature e.g. Bosnia & Herzegovina and Cyprus.

Issues of national culture and political system clearly influence e.g. Greece – where there is strong municipal influence, and Hungary – where a strong centrist theme has seen a change from industry led to government mandated approach. Canada is both sophisticated and distributed i.e. Quebec focuses on a Quebec solution, while Ontario focuses on a ‘rest of Canada’ solution.

Most of the territories reviewed are members of the European Union, and it is therefore of no surprise that EU legislation underwrites the legal basis under which many of those specific territories operate and have common themes / strategies as to how they operate in this context.

Governance arrangements are mixed. They are somewhat opaque in some territories, very detailed in most, and show quite wide variance across independent, ownership, and sector representation models.

Some of the territories reviewed are currently under-going judicial reorganisation e.g. Romania.

The review leaves no doubt that brand owners and the distribution system take a firm stake in the governance of PRO arrangements in most territories, perhaps an obvious conclusion given the significant cost and brand reputation risks associated with EPR for the brand owner.

This review is information rich and should enable a comprehensive understanding of the structural and governance options available for forming a New Zealand Priority Plastic Product PRO.

*N.B. A great deal of the information in this review has been extracted from the websites of PROs that operate in a language other than English. Google Translate has been a great assistant, however due to issues of time constraint text translations have not always been edited. At times more detail than normal has been provided for fuller context.*

## 1. Belgium

Belgium has become a world champion when it comes to the sorting and recycling of household packaging waste. This leading position was achieved, not only because the vast majority of Belgian citizens sort their waste in a very responsible manner, but also because Fost Plus has implemented an easy and efficient system. Each party involved has a clearly designated role to play. These parties include the citizens, producers and importers of packaged products and packaging, public authorities, municipalities and inter-municipal authorities, and the companies that collect, sort and recycle the packaging materials.

Fost Plus introduced the system of selective collection in 1994 and continues investing in its further optimization. Fost Plus actively encourages citizens to sort properly and respect the guidelines.

<b>Population</b>	11 mil.
<b>No. of local authorities</b>	11 mil. inhabitants covered by the system. 589 municipalities
<b>No. of companies in system</b>	5,200 members
<b>Packaging introduced to the market</b>	750,000 tons representing about 92% of all packaging materials brought onto the Belgian market
<b>Recovered waste</b>	700,000 tons of packaging are recycled. 92% of the packaging collected is recycled. 95% is recovered
<b>Types of packaging</b>	Household packaging or equivalents

### Legal Basis

European Directive 2004/12/EC and the Cooperation Agreement between the three regions form the two pillars on which Fost Plus's activities are founded. The Cooperation Agreement adapts the European Directive to the specific characteristics of Belgium and includes specific targets.

In Belgium, the Walloon Region, the Flemish Region, and the Brussels-Capital Region are responsible for waste management policy. In 1996, they agreed on a Cooperation Agreement on the prevention and management of packaging waste. A new version of the agreement came into force in 2009.

The Cooperation Agreement requires every company which has packaged or arranged for the packaging of products sold in Belgium to take back its used packaging to achieve the prescribed recycling and recovery rates:

- 80% recycling and 90% recovery in total
- a minimum of 15 to 60% recycling, depending on the packaging material.

### Packaging organisation/s in Belgium



**Valipac** is a non-profit organisation established to fulfil the obligations defined in the law and to stimulate the recycling of industrial packaging waste.

<https://www.youtube.com/channel/UC-gmRKssnMtG19v3JsT8g0Q>

## System Description

**Valipac** started up in 1997 as an initiative of the Belgian business world to provide a collective response to the **Extended Producer Responsibility** for commercial and industrial (C&I) packaging. Valipac's basic mission is to achieve the recycling rates imposed on the clients for the C&I packaging they put on the Belgian market.

In order to achieve circularity of C&I packaging, Valipac has set 4 commitments:

1. to encourage clients to use circular packaging
2. to ensure the traceability of C&I packaging waste and to guarantee its effective recycling,
3. to stimulate local recycling and,
4. to further encourage the selective collection of C&I packaging in companies.

## Necessary costs

Article 14 Cooperation agreement on packaging and packaging waste.

## Efficiency

Not mentioned in the legislation.

## Eco modulation

Valipac applies dissuasive fees: no fee for reusable packaging, the highest fee for non-recyclable packaging, the average fee for plastic packaging and a lower fee for recyclable packaging (excl. plastics).

## Data denominator

(data on the collection and treatment of waste):

Global quantities per type of packaging waste stream and specific quality collected in Belgium and sent to recycling or valorization by waste management companies. Waste management companies report every two months and data are controlled each year by independent auditing firms.

## Data numerator

(reporting system to gather data on the products placed on the market)

Global quantities per type of packaging are reported by companies selling packaged goods on the Belgian market. Valipac only registers secondary and tertiary packaging.

## Online sales

N/A.

## Default measurements vs Average Loss Rates

Valipac does composition analyses on outgoing packaging material at sorting centers and applies individual percentages to the reporting of waste management companies (in order to exclude impurities and non-targeted materials). Extra corrections are applied to comply with the EU methodology (moisture, ...). Furthermore, only packaging waste with proof of effective recycling can be taken into account in the reporting.

## Competition

N/A.

## Prevention

According to Article 23 of the *operating license of Valipac*, it is necessary to establish an action plan for the prevention of packaging waste aiming at the **reduction of at least 5% of the quantity of non-returnable packaging** placed on the market by the clients.

## Sorting waste

**The residual waste** generated by companies still contains on average 50% of materials that could have been recovered if they had been sorted at source<sup>1</sup>

By sorting wood, plastic, paper and cardboard, and organic waste, just under half the volume of residual waste containers can be freed up. Valipac seeks to make the most of these materials, the majority of which are subject to mandatory sorting!

Having the waste collected by a Valipac-affiliated waste management company is a guarantee that it will be handled according to the rules. It also means benefiting from **bonuses for sorting industrial packaging waste**. Valicap offers its customers the opportunity to ask questions about waste sorting in the company, and to find all useful information on the new **Valipac platform (FR and DU only)**.

## Governance

TBC

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## 2. Bosnia and Herzegovina (BiH)

Population: estimated 3,791,662

Constitution – Dayton Agreement, signed in 1995. which divided the country in two entities: Federation of BiH and Republica Srpska, plus later Brcko District Federation of BiH (51% of the territory) is administratively divided on 10 cantons; cantons are divided into 84 municipalities Republica Srpska (49% of the territory) is administratively divided into 64 municipalities The city Brčko is separate administrative unit – District under the sovereignty of BiH Note – each of the entities has its own constitution and government; In total, more than 100 different ministries. Three-member state presidency rotates the chairmen every eight months. Office of the High Representative is present as an ultimate arbiter, to oversee the implementation of the civilian aspects of the Agreement.

Population structure remains predominantly rural (57%); only 5 cities exceed 100.000; the cultural gap is constantly widening also among the age groups. Unemployment rate 45.5% official rate; grey economy may reduce actual unemployment to about 30%.

Development of the system of packaging and packaging waste management and its functioning in practice is one of the great challenges for the country, as well as the industry, and is related to the broadest community and all citizens.

Bosnia and Herzegovina has started its activities in defining the future model of packaging and packaging waste management in very unfavourable economic circumstances, in the midst of the global economic crisis. Taking into consideration the undeveloped economy and relatively low standard of citizens living, it can be said that this issue is really a challenge placed in front of the entity ministries of environment and Bosnian packaging industry.

Less than 50% of the territory of Bosnia and Herzegovina is covered with organized waste collection.

<b>Population</b>	<b>3,8 mil.</b>
<b>No. of companies in system</b>	<b>510 membres</b>
<b>Recovered waste</b>	<b>Recycled 10,000 tons of packaging waste achieved recycling/recovery target of 20%</b>

### Legal Basis

There is no Ministry of Environment at the state level, only department within the Ministry of Foreign Trade and Economic Relations covering the environmental protection.

Two entity Ministries of Environment (Federation of B&H and Republika Srpska) are creating the environmental policy within the country. Environmental Department within Government of Brcko District defines legal frame for this area.

In order to align the environmental legislation at the state level, the so called “Inter-entity Body of Environment“ was established. This body is consisting of representatives of both entity ministries, Brčko District and Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina.

Waste is one of the most important environmental issues in B&H. Currently, municipal waste is regularly collected in approximately half of the urban settlements, but rural settlements generally are not included in the waste collection schema. Insufficient waste disposal capacity has led to considerable quantities of waste dumped illegally at roads, in the rivers and similar places, posing a threat to public health and not to mention the environment.

## Packaging Organisation/s in BiH:



**Ekopak** is the first and leading packaging recovery organisation in Bosnia and Herzegovina, whose goal is establishment and development of an efficient, integrated system for the management of all types of packaging waste: glass, paper, metal, plastic, wood, and multilayer materials.

The role of **Ekopak**, packaging recovery organisation, is to take responsibility for the fulfilment of legal obligations on behalf of its clients, producers of packaging, importers, fillers, distributors, and retailers, with the lowest sustainable cost and for the benefit of the entire community.

**Ekopak** is a non-profit company established in 2011, with the aim of taking over the responsibility for fulfilment of legal obligations for recycling and re-use of packaging waste in Federation of Bosnia and Herzegovina on behalf of packaging producers, importers, fillers, distributors and merchants. By obtaining permit from Federal Ministry of Environment and Tourism on 29 May 2012, we became the first and leading system operator of packaging waste management in Bosnia and Herzegovina. Our activities are based on the best EU practice from this area, but on high business standards as well, in accordance with the standards of the company founders.

### System Description

Ekopak is the first and leading packaging recovery organization in Bosnia and Herzegovina, whose goal is the establishment and development of an efficient, integrated system for the management of all types of packaging waste: *glass, paper, metal, plastic, wood and multilayer materials*.

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The mission of Ekopak is to enable the fulfilment of legal obligations in accordance with the Ordinance on Packaging and Packaging Waste Management with minimal economic efforts, for all its clients.

The strategy of Ekopak:

- Implementation of legislation on packaging and packaging waste in accordance with the best European and worldwide experience and knowledge.
- Establishment and development of an efficient and effective integrated system of packaging waste management for all types of packaging waste: glass, paper, metal, plastic, and wood.
- Use of existing communal capacities for system establishment and its further development through system development.
- Use of experience and knowledge from the best EU countries' experience and knowledge.

### Prevention

**Ekopak** bases its activities on the following principles:

- Fulfillment of legal obligations in accordance with the Ordinance on Packaging and Packaging Waste Management with the greatest possible ecological benefits, with minimal economic efforts and minimal impact on consumer prices for packaging products.
- All clients are being treated equally.

- Packaging fees will be calculated according to real costs per packaging material and there will be no cross subsidizing.
- There is no intention to make a profit; potential surplus will not be distributed to the owners but reinvested into the operation.
- Ekopak committed to transparent work, based on all legal requests and is subject to all audit controls by authorized bodies and institutions.
- All submitted client data will be protected and treated as confidential.

## Legislation

In the process of integration of Bosnia and Herzegovina to EU, our country has determined to adjust its legislative with Acquis Communautaire, respectively, legal acquisition of European Union. Harmonization of legal obligations is being implemented in all segments, including environmental protection.

EU directives and legislative, especially Directive 94/62/EC on packaging and packaging waste, defines principle of „extended producer responsibility“, respectively, responsibility of all subjects in the life-cycle of packaging; producers, fillers (producers of finished products), importers, distributors and merchants; to recycle and re-use packaging waste evolved on the market after consumption of their products in the percentages defined by the country, until the goals from the EU Directive are fulfilled.

Possibility for the packaging industry, i.e. legal obligors: packaging producers, fillers, importers, distributors and merchants, to establish their system operator, through which they fulfill their legal obligations, is a good practice accepted from European countries, proven to be the most efficient and most rational.

Seven leading companies from different packaging industries from Bosnia and Herzegovina founded Ekopak d.o.o. in accordance with the principle of „extended producer responsibility“, that is incorporated in the Ordinance of Packaging and Packaging Waste Management (Official Gazette of FB&H, no. 88/11, 28 December 2011)

## Founders

- Coca Cola HBC
- Bikacka Pivovara
- Banjalucka Pivara
- Orbi & Co
- Violeta
- Bimal
- Argeta

## Governance

TBC

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### 3. Bulgaria

<b>Population</b>	<b>2,870,340</b>
<b>No. of local authorities</b>	<b>1,200 clients</b>
<b>Packaging introduced to the market</b>	<b>130,683 tons licensed packaging</b>
<b>Recovered waste</b>	<b>70,553 Recovered 70,450 Recycled</b>
<b>Types of packaging</b>	<b>All types</b>

#### Legal Basis

The Bulgarian legislation concerning the Packaging Waste Recycling includes the Waste Management Act (WMA) and an Ordinance on Packaging and Packaging Waste, was adopted in Bulgaria in the period 2003 – 2004. These documents met the related EU directives' requirements and defined the responsibilities of the parties involved in the process. In July 2012 a new WMA was adopted by the Parliament, that fully reflects the provisions of Directive 2008/98/EC. A new Ordinance was adopted, defining that 6 000 000 inhabitants should be covered in separate collection systems by the acting ROs, according to their market share.

According to the legal framework all producers or importers of packaged goods are obliged to collect, recycle and recover their packaging waste. They have obligation to achieve targets for recycling and recovery of packaging waste generated in result of the use of the produced/imported goods. They may fulfill their obligations under the WMA and the Regulation at their choice:

- **individually**, or
- **through a collective system**, represented by a recovery organization.

The targets are quantitative and are defined in the Ordinance on Management of Packaging Waste as a percentage of the total quantity of packaging waste generated. Of course, these resulted from Directive 94/62/EC and its later amendments and corrections. For Bulgaria, the recovery targets started at 35 % for 2006 and currently, for 2013 they are 56 %.

#### Packaging organisation/s in Bulgaria



ECOPACK is the first licensed recovery organization in Bulgaria by the Ministry of Environment and Waters in January 2004, established by the industry – 18 leading local and multinational companies. It is a legal entity registered under the Commerce Act and Waste Management Act, which does not distribute profit and is responsible for separate collection, recycling and recovery of packaging waste on behalf of its member companies. Since its establishment, ECOPACK is a market leader. ECOPACK Bulgaria is certified for BDS EN ISO 9001:2008 Reg. № TRBA 100 0607 and BDS EN ISO 14001:2005 Reg. № TRBA 110 0070.

#### System Description

The revenue (fees) from Bulgarian clients and from selling the materials to recyclers is invested in the development and operation of separate collection systems in the municipalities. The systems include:

containers, sorting facilities and transport equipment. ECOPACK Bulgaria develops the three-colored containers system: blue for paper and cardboard, yellow – for plastic and cans, and green – for glass packaging.

ECOPACK Bulgaria works with sub-contractors – some companies are engaged in picking up and transporting the packaging waste from the containers, and others are responsible for the separation of recyclable packaging waste.

Then the sorted recyclable packaging waste is sold to recyclers as a raw material for use in production. The channels for collection of packaging waste are: separate collection from household, administrative and other buildings, Industrial/commercial and collectors.

The municipalities do not have any financial relations with the Recovery Organization. Their only obligation is to define the locations of the three containers, to implement control over the population on the separate collection of waste and to support the information and education campaigns for the promotion of separate collection of packaging waste.

## **Prevention**

ECOPACK Bulgaria creates and manages jointly with partner Municipalities systems for separate collection of packaging waste. In 2019, such systems have been set up in 88 municipalities and include:

### **1. Color-coded Igloo type containers**

With a volume of 1100 and 1500 liters. Blue for paper and cardboard, yellow for metal and plastic packaging, and green for glass. This is the most widely used and proven model in Europe.

### **2. Types of transport vehicles**

The types of containers used by ECOPACK Bulgaria require specialized waste-collection equipment and trucks.

A GPS system has been implemented to improve the quality of the service provided and enhance control over service companies. To that end, the waste-collection vehicles have been equipped with devices allowing real-time monitoring by ECOPACK Bulgaria and the respective municipalities of the route execution and tracking of any interruptions in scheduled servicing of the respective color-coded containers.

To keep citizens informed about planned routes and schedules, each truck carries a sign indicating what color containers are being serviced on that particular day. Collection frequency depends on annual waste volumes and rates and is negotiated with the respective Municipality in order to ensure regular transportation of collected packaging waste and avoid overflow and littering in the area of the containers.

### **3. Sorting facilities**

ECOPACK Bulgaria has built up 15 own sorting facilities and has concluded rental contracts for another 3. The organization works with 47 subcontractors and hands over packaging waste for recycling and/or recovery to 27 recycling plants in Bulgaria and abroad.

The installed mechanical sorting facilities comply with all legal and technical requirements and their geographical location has been planned to cover all established systems for separate collection. The facilities make it possible to process 1 to 8 tons per hour of separately collected packaging waste, sorting all materials in line with Art. 24, Paragraph 4 of the Ordinance on Packaging and Packaging Waste. They sort incoming waste collected from administrative buildings, the retail network, and from individual industrial plants in the territory of the respective municipalities. One of the sorting lines is specialized in processing glass packaging, ensuring an exceptional purity rate of 99.7%.

The systems for separate collection of packaging waste established in the territory of the municipalities function under the following parameters:

### Size of population covered and minimum volume of the containers in place

- For localities with a population of more than 100,000, containers of minimum volume of 3,300 l per 800 residents.
- For localities with a population of 50,000 to 100,000, containers of minimum volume of 3,300 l per 600 residents.
- For localities with a population under 50,000, containers of minimum volume of 3,300 l per 400 residents.

### Collection from hotels, restaurants, and cafes – HORECA

This method essentially consists in collecting packaging waste generated at hotels, restaurants, and cafes with the assistance of the municipal administrations.

### Individual household door-to-door collection

This method involves providing individual yellow containers of a volume of 120l and 240l to households in compact low-rise residential areas. The residents dispose of paper, cardboard, metal, and plastic packaging waste in these containers. Green containers for the disposal of glass packaging are made available in select locations.

### Collection from retail outlets

The conditions for collection of packaging waste from retail chains, individual outlets and gas stations in partner municipalities are negotiated through the signing of contracts. The sites included in this system are provided with individual containers depending on the amount of packaging waste generated. They are included in service schedules different from those for the containers located in residential areas.

ECOPACK Bulgaria organizes public awareness campaigns aimed at improving consumer knowledge and motivation with respect to separate collection and recycling of packaging waste in Bulgaria with a focus on the three stages of Collection – Separation – Recycling; Raising consumer awareness of the benefits of separate collection; Motivating and sustaining an active and committed attitude to the protection of the environment and the saving of natural resources.

### Governance

#### Shareholders

Coca-Cola HBC	Ficosota	Prista Oil
Unilever	ITD Food	Gotmar Food
Herti	Devin	Pobeda
Carlsberg	Sars Group	Ganchev
Orbico	Danone	Quadrant Beverages

#### Board

The company has a 7-member board.

## 4. Canada

In the context of Canada, EPR programs have been implemented for various products and materials to address environmental concerns and promote recycling and proper disposal. These programs often involve collaboration between government agencies, industry stakeholders, and consumers to ensure effective waste management and environmental stewardship.

In Canada, EPR programs have been established for a range of products, including electronics, tires, packaging materials, batteries, and more. The specific regulations and implementation of EPR vary by province and territory, as environmental policy is primarily managed at the provincial level in Canada.

### Quebec:

Eco Entreprises Quebec (EEQ): The Eco Entreprises Quebec manages the province's EPR program for packaging and printed materials. EEQ works with businesses to ensure compliance with regulations, manages recycling programs, and promotes eco-design and waste reduction. Website: <https://www.eeq.ca/>

<b>Population of Quebec</b>	8,7 mil.
<b>No. of local authorities</b>	1,110 municipalities grouped into 568 local or regional authorities
<b>No. of companies in system</b>	Over 3,199 contributing companies and organizations
<b>Packaging introduced to the market</b>	655 000 tons
<b>Recovered waste</b>	461,000 tons of containers and packaging (57.8%)
<b>Types of packaging</b>	All containers and packaging except soft drink and beer containers covered by a deposit program

### Ontario:

Circular Materials: Ontario has been increasingly focusing on circular economy principles, aiming to reduce waste and promote sustainable resource use. Various initiatives and organizations are working towards this goal, including Circular Materials, which focuses on advancing circular economy practices and EPR programs in the province. Website: <https://www.circularmaterials.ca/news/transition-launch/>

### Legal Basis:

From 2005 to 2022: a financial responsibility

The Municipal Powers Act gives municipalities jurisdiction over residual materials management.

The [Environment Quality Act](#), which introduced the EPR concept in 2002, and the Regulation respecting compensation for municipal services provided to recover and reclaim residual materials (adopted in 2004) established the industry's obligation to financially compensate municipalities for the cost of curb-side recycling. The share of producers' financial responsibility has gradually grown from 50% in 2005 to reach 100% in 2013. Municipal services usually include residential units and small industries, commerce, and institutions (ICI).

Quebec's Regulation covers all types of containers, packaging, and printed matter, but not books or other items designated by another regulation or formal program, such as the deposit system.

ÉEQ is the organization certified to compensate the cost of recycling materials in the “containers and packaging” and “printed matter” classes.

Starting 2022: transitioning to a full EPR of the curb-side recycling system, to be effective in 2025.

In 2021, the Government of Québec adopted the “Act to amend mainly the Environment Quality Act” with respect to deposits and selective collection”. The goal of this reform is to place producers at the heart of the curb-side recycling system by giving them full responsibility for containers, packaging, and printed paper they put on the market, from design to recycling, while prioritizing local markets as we work towards a circular economy. The bill sets the table on the terms of the transition from the compensation plan to EPR approach.

In 2022, the Regulation for the modernization of curb-side recycling system was enacted. The Regulation assigns responsibility for developing, implementing, and funding a modernized curb-side recycling system to producers that market or distribute containers, packaging, and printed paper in Québec. Supported by more than 2000 producers, ÉEQ has been appointed the Producer Responsibility Organization (PRO) for curb-side recycling which means that ÉEQ is now responsible for developing, implementing, and financially supporting the modernized curb-side recycling system on behalf of the obligated producers.

Containers, packaging, and printed matter including newspapers and travel, wine, or automobile guides, school textbooks, and so on, with a useful life of less than five years are all targeted. New products will be added to the existing compensation scheme:

- Single-use products such as straws and utensils intended for the preparation or consumption of food products, and containers and packaging items such as hooks and hangers used to support or display products.
- Managers of transactional websites for products such as single-use containers, packaging and printed matter covered by the Regulation but acquired outside Québec by an individual for personal.

Gradually, from 2025 to 2031, the owners and managers of multi-unit buildings; condominium associations; and industrial-commercial-institutional buildings will have to participate in the system and, in certain cases, make collection bins for system-targeted residual materials available to their clientele and/or residents.

ÉEQ must achieve the recovery, reclamation, and local reclamation outcomes by type of residual material, which will evolve over time. The achieved performance rates will be subject to government-audited, annual reporting. The traceability of residual materials must be ensured up to their final destination so that they are considered in the calculation of the achieved performance outcomes, which will encourage local and neighbouring market solutions.

### **Product responsibility organisation/s**



Éco Entreprises Québec (ÉEQ) is a private, non-profit organization that represents companies with regard to their responsibility to financially compensate 100% of the net costs of municipal curb-side recycling in a sustainable development perspective.

With company contributions, ÉEQ finances municipal services for the collection, transportation, sorting and conditioning of containers, packaging and printed matter put on Québec’s market. Our contributors include retailers, distributors, food and consumer products manufacturers, durable goods manufacturers, and services companies (i.e. financial and insurance services, accommodations, food services, government, and para-government agencies, etc.).

As an organization founded by the industry, ÉEQ is naturally concerned by each step in the curb-side recycling value chain. Along with our partners, we track and capitalize on every opportunity to enhance efficiency, optimize costs and recover increasing quantities of better-quality materials. In 2013, EPR Canada, a private independent organization, ranked the province of Quebec first, along with British Columbia, for its commitment to the implementation of EPR programs. Also, as part of its benchmarking of Canadian EPR programs for containers, packaging and printed matter, the American Product Stewardship Institute (PSI), under the direction of the Packaging Association of Canada, ranked Quebec as having the “Highest Performing Program” with regard to the greatest number of indicators assessed.

### **System Description:**

As for the fee structure, criteria used by ÉEQ to determine company contributions are legally required to evolve over the years to make targeted companies accountable for the environmental footprint of the products they manufacture, market, distribute or commercialize. A variety of factors are therefore considered:

- recycled content
- nature of materials used.
- volume of residual materials produced.
- potential for recovery, recycling, or reclamation

In 2013, ÉEQ will introduce the first credit for post-consumer recycled content in some plastic and fibre containers and packaging to grant a 20% credit to companies who include 100% recycled content in their containers and packaging.

The organization has been certified by the Quebec government since 2005 to establish a fee structure and collect company contributions. Those obligations make the province of Quebec the most demanding legislative framework in Canada with regard to extended producer responsibility (EPR).

ÉEQ’s guiding principles of fairness, integrity, thoroughness, and transparency as well as its innovative spirit and its entrepreneurial vision of curb-side recycling are the reasons why its initiatives are gaining recognition throughout Canada and North America. In partnership with its stakeholders, ÉEQ has taken a leadership position to improve the performance of the recycling value chain by optimizing at the source materials generated by companies through eco-design, enhancing the curb-side recycling system and promoting efforts to increase the quantities of recovered materials at the lowest possible cost. ÉEQ is also dedicated to improving materials sorting and conditioning and the economic value of recovered materials.

### **Prevention**

#### **Entry into force of the 2022 Schedule of Contributions:**

The 2022 Schedule of Contributions (SoC) was published today July 13, 2022 in the *Gazette officielle du Québec* by [Order of the minister](#). This publication marks the official opening of the 60-day reporting period.

Targeted companies have until September 13, 2022 to report the containers, packaging and printed matter marketed during the 2021 calendar year in Quebec.

For full payment calendar details, [see the deadlines for your obligations](#).

#### **Retirement of Eco-D**

After many years of loyal service, our Eco-D reporting portal took a well-deserved retirement on April 29 2022.

After a short transition period, a breath of fresh air allowed ÉEQ to better meet the needs of contributing companies. [A brand-new reporting portal is now fully functional and ready to take over](#).

You will receive an email with an invitation code and instructions on how to log in to the new reporting portal. Since your Eco-D access code is no longer valid, you will need to create a new user account.

### **New terms and conditions apply for the 2022 SoC**, including:

- Obligation of operators of transactional websites, with or without a place of business in Quebec and whose products are acquired by e-commerce.
- Containers and packaging of wood and cork must now be reported.
- Polypropylene containers (plastic #5), which must now be reported separately from other plastics and polymers.

### **Renewal of the bonus**

The eco-design incentive bonus pilot project is back! Launched in 2021 to recognize and reward companies' efforts in the eco-design of containers and packaging, the 2022 edition has been improved. The application form has been simplified to facilitate the process and the available bonus has been revised upwards. Companies that have put eco-designed containers and packaging on the market in 2021 could therefore benefit from a credit of up to \$60,000 on their annual contribution. Other terms and conditions apply.

### **Governance**

ÉEQ's board of directors is made up of 10 member administrators and 4 non-member administrators appointed based on their skills profiles and experience relating to the value chain of container, packaging, and printed matter recycling in Quebec.

ÉEQ has adopted a Code of Ethics for Directors (In French) that Directors must adhere to.

- Vice-President, Operations, Metro Banner, Metro inc.
- Executive Vice President, Operations, North America, A. Lassonde inc.
- Vice President, Sales, Business Solutions, TELUS Quebec
- Manager, Marketing and Corporate Affairs, Quebec, Best Buy Canada
- Director, Financial and Strategic Planning, SAQ
- Vice President, Marketing, Innovation and Strategy, Groupe St-Hubert Inc.
- Senior Vice-president, Public Affairs, Cooperation and Corporate Responsibility, Sollio Groupe Co-op
- Vice President, Operations, Nespresso
- Plus 4 non-member directors

The board has six committees, as follows:

- Committee on Eco-design and Circular Economy
- Audit and Finance Committee
- Human Resources Committee
- Governance and Ethics Committee
- Special Governance and Ethics Committee
- Committee on the Modernization of Curb-side Recycling (A committee set up by the Board of Directors for the duration of the work on the curb-side recycling modernization project, comprising 6 representatives of sectorial associations and 5 business representatives approached for their expertise)



Circular Materials is a producer responsibility organization (PRO) committed to supporting producers in meeting their recycling regulation requirements. They design recycling systems that advance innovation, deliver improved environmental outcomes and harness competitive procurement to unlock value for our producer members.

Circular Materials aims to create efficient and effective recycling systems. They are a national not-for-profit producer responsibility organization that represents the evolution to a more circular economy where materials are collected, recycled and returned to producers for use as recycled content in new products and packaging.

Founders: Circular Materials was founded by 17 of Canada's leading food, beverage and consumer products manufacturers, restaurants and retailers.

### **System Description**

Extended producer responsibility (EPR) is a policy approach to recycling in which producers/stewards – the organizations that supply packaging and paper – are financially responsible and accountable for those materials over their full life cycle. By meeting EPR requirements, producers/stewards help to drive a circular economy by improving recycling rates and encouraging a more efficient use of materials.

Circular Materials currently operates as a producer responsibility organization (PRO) in Nova Scotia, New Brunswick, Ontario, Alberta and Yukon and supports EPR programs in Manitoba (Multi-Material Stewardship Manitoba), Saskatchewan (Multi-Material Stewardship Western) and British Columbia (Recycle BC).

Circular Materials' Producer Guide provides information to assist producers across Canada with registration, annual reporting of supplied materials and the payment of annual fees.

### **Prevention**

The following principles contribute to effective extended producer responsibility programs.

#### Standardized lists

A standardized list of collected materials for recycling in the province (and across the country if possible) achieves economies of scale and program efficiencies, while providing clarity for residents.

#### Producer autonomy

Producers must have the autonomy to design a recycling system that respects local conditions (such as geography, population densities, etc.) while maximizing efficiency and optimizing environmental performance.

#### Regulatory fairness

Regulations must be designed for fairness. All obligated producers need to participate and regulators must be prepared to take appropriate enforcement action to support compliance with the regulation.

#### Material value

Materials must pay their own way in the recycling system. Higher-value materials should not cross-subsidize lower-value materials.

### Accountability

Producer responsibility program operators and service providers are held accountable, meaning that operators, collectors, transporters, recyclers and processors of end-of-life products/materials are auditable and accountable for their performance.

### Standards

Appropriate standards are established so that collectors, transporters, recyclers and processors can demonstrate their compliance with international, federal and provincial laws and industry standards where applicable.

### Continuous improvement

A commitment to continuous improvement and fostering responsible recycling helps achieve higher recycling rates over time.

## **Our services**

We develop, implement, and support effective and efficient recycling programs across Canada.

- Recycling program design and implementation - we design and implement extended producer recycling programs to help producers meet their regulatory obligations.
- Recycling supply chain operations - we create, maintain and manage procurement frameworks, including a library of service standards, statements of work and master service agreements, and we manage these contracts across the entire supply chain.
- Producer registration and reporting - we have a dedicated team to support producer onboarding, education, program registration and reporting.
- Costing and fee-setting - we create and implement innovative fee-setting models designed to meet regulatory performance requirements. These models determine each material's share of the total amount producers pay to finance provincial recycling programs.
- Regulatory reporting and analytics - we track, analyse, and report the performance of various program elements such as tonnes collected and managed, recovery rate, households served, greenhouse gas emissions and financial performance that adhere to the financial and performance audit requirements of specific provincial regulations.
- Information technology and systems - we use best-in-class, secure and scalable technology services to provide various platforms for producers, service providers and our team to optimize efficiencies across multiple programs.
- Financial and administrative services - we provide financial and administrative services, including producer invoicing and accounts receivable, service provider claims verification, accounts payable, financial reporting and audit management.
- Promotion and education - we provide clear, compelling, and best-practice consumer promotion and education initiatives that increase recycling rates and drive results.
- Project management - we have dedicated project managers who are responsible for program implementation, delivery of annual business cycle activities and management of continuous improvement initiatives.

## Governance

We were created by producers for producers. Meet our board of directors, representing Canada's leading manufacturers, restaurants, and retailers.

Chair	Kraft Heinz
Vice Chair	Loblaw Companies
Board	The Clorox Company
	Metro Inc.
	Pepsico
	McDonald's
	Sobeys Inc
	The Minute Maid Company
	Maple Leaf Foods
	Proctor & Gamble
	Lassonde Industries
	Restaurant Brands International
	Nestle
	Costco
	Keurig
	Coca-Cola
	Recipe Unlimited

## Collaborations

Circular Materials is committed to working with thought leaders who support collaboration and initiatives to advance the circular economy.

- APRA – Alberta Plastics Recycling Association
  - Canada Plastics Pact
  - Chemistry Industry Association of Canada
  - Circular Innovation Council
  - Éco Entreprises Québec
  - European Association of Plastics Recycling & Recovery Organisations
  - PRFlex
  - Product Stewardship Institute
-

## 5. Chile

### Packaging organisation/s in Chile



ReSimple is a nonprofit organization and the 1st PRO for attend the Extended Producer Responsibility Law for packaging in Chile.

It ´s responsible for organizing, finance, connect and synergize the recycling of household and industrial packaging introduce in the Chilean market by producers (manufacturers and importers) to later promote their collection, pre-treatment, and recovery.

This project was born in 2019 under the wing of the AB-Chile guild with the aim of forming a Collective Management System for packaging to compliance with the goals and obligations of the EPR Law.

At the beginning of August 2022, received the favorable report from the Free Competition Defense Court. Since October obtained the legal personality and submit the management plan to evaluation for the environmental authorities, that is expect will be approve at the first quarter of 2023.

#### System Description

ReSimple is made up exclusively of producers. Financing comes directly from the material fee that producers must finance.

Resimple interacts with the different municipalities to finance the recyclable fraction.

The coverage obligations for house-to-house collection model start in year 1 (2023) with 10% and propose to reach 80% in year 12. Those Municipalities that do not receive house-to-house collection in year one, and it have more than 250 thousand inhabitants with corrected population (decrease every year), Resimple will have to attend with a reception and storage facility available, that will be managed 100% by informal sector (waste pickers).

In this way, it is expected to achieve national coverage and solution to citizens with some alternative before the 5th year throughout the Chilean territory. Collective management systems.

Producers who assume the fulfilment of their obligations collectively must do so through the incorporation or incorporation of a legal entity that does not distribute profits among its associates, which will be responsible to the authority. A such legal entity shall have as its exclusive purpose the management of waste from priority products, and in no case shall it be understood as a public interest organization for the purposes of Law No. 20,500. Collective management systems shall be integrated exclusively by producers.

Large Collective Household Systems or GRANSIC: collective management systems, composed of 20 or more unrelated persons, formed to comply with the obligations imposed on household packaging producers by the DS12.

Individual management systems and collective management systems composed of less than 20 unrelated producers, according to Article 8, may meet their collection and recovery goals only with the waste into which the packaging introduced into the market by the producers that make up such management systems becomes. This does not apply to GRANSICs, which may meet their collection and recovery goals with any packaging waste.

ReSimple is the 1st GRANSIC in conformation that will comply with the Extended Producer Responsibility Law (REP Law) for packaging.

As stated in the REP Law and Supreme Decree 12 (DS12), we are in charge of organizing, financing, connecting and synergizing the recycling of containers and packaging generated by producers to then promote the collection, pre-treatment and recovery of the same.

Our purpose is to help and motivate companies, institutions and individuals to live in a more sustainable country for current and future generations.

This project was born in 2019 under the auspices of the AB-Chile guild with the objective of forming a Collective Management System of containers and packaging to meet the goals and obligations of the REP Law.

Since April 2021, we have been in the process of processing in the institutions of free competition in our country (TDLC and FNE) to later request authorization from the Ministry of Justice and the Ministry of Environment. We expect to finish this process in July 2022, in order to present our management plan to the Ministry of the Environment before September 2022 as required by the DS12.

ReSimple will be responsible for compliance with the goals and obligations of the companies affected by the REP Law in the household and non-household categories.

## **Prevention**

### **What is the REP Law?**

Law 20.920, framework law for waste management, Extended Producer Responsibility and Promotion of Recycling, known as REP Law, aims to reduce the generation of waste and promote its reuse, recycling and other types of recovery, through the establishment of extended producer responsibility and other waste management instruments, in order to protect people's health and the environment.

### **EPR: It is an economic instrument for waste management.**

Obliges producers of certain products to organize and finance the management of waste derived from the products marketed in the country.

One of the principles that inspire the REP Law is the "polluter pays" principle, in which the generator of waste is responsible for it, as well as for internalizing the costs and negative externalities associated with its management.

Extended producer responsibility will be applicable to those who introduce into the domestic market consumer goods packaged or packaged composed of at least one of the following materials: cardboard – paper, plastics, metals, beverage cartons and glass.

### **They will not be subject to the REP:**

- Producers that qualify as micro-enterprises, as defined by Law No. 20,416.
- Producers that introduce in the market less than 300 kilograms of containers per year.
- Reusable containers.

### **Collective management systems.**

The producers that assume the compliance of their obligations in a collective manner, shall do so through the constitution or incorporation of a legal entity that does not distribute profits among its associates, which shall be responsible before the authority. A such legal entity shall have as its exclusive purpose the management of waste from priority products, and in no case shall it be understood as a public interest organization **for the purposes of Law No. 20,500.**

Collective management systems shall be integrated exclusively by producers.

## Governance

Corporation Collective Packaging and Packaging Management System RESIMPLE

Board Members:

- Commercial Engineer
- Electronic Civil Engineer, Master in Electronic Engineering
- Lawyer at Diego Portales University, Master in economic and financial law.
- Lawyer, Diploma in Administrative Sanction Law and Diploma in Natural Resources and Master in Regulatory Law
- Lawyer
- Industrial Civil Engineer University and Ph.D. in Operations and Logistics
- Industrial Civil Engineer and MBA.

## Founding Members



## 6. Colombia

In Colombia, the PRO Visión 3030 has been active since 2019 as the national ruling was published in 2018 and requires producer organizations to demonstrate the recovering and use of 30% of the total amount of packaging waste put on the market by 2030, starting with a 10% goal for 2021. For 2024, the goal is 16%.

Currently, Visión 3030 represents over 350 producers, located at 18 out of 32 departments of the country, and covers 69 economic groups according CIU international codification.

Measuring the amount of packaging waste was an initial challenge and now is one of the strongest processes that producer organizations have internalized and committed to embrace, in order to reduce the impact.

Since the creation of the PRO, over €6 million have been allocated to 5 strategic objectives: strengthening value chains, promoting applied research, driving social and productive inclusion, executing territorial projects, and delivering consumer pedagogy. These efforts have resulted in the recycling of over 150 thousand tons of postconsumer packaging waste, working together with over 100 collecting organizations plus 45 recycling sites over the country.



VISION 30/30, under the principle of strengthening existing mechanisms, Vision 30/30 ANDI articulates with 94 managers at the national level that can be of different types:

1. organizations of recyclers in processes of formalization as providers of sanitation services,
2. Marketers that correspond to specialized warehouses that buy and sell materials.
3. Public utility companies, and
4. Others such as non-profit entities that have been called “solidarity managers” because they do not buy the materials or provide the public sanitation service to the consumers/generators.

After nearly four years of implementation, ANDI – VISION 3030 has been solidifying its position as the most significant collective in the country and a reference that leads and promotes a circular economy model for packaging. This has been achieved through the collaboration of stakeholders and the development of competitive strategies that ensure and surpass regulatory compliance, address collective needs, and contribute to corporate ESG goals, generating a positive and visible impact on the country’s sustainability.

### System Description:

**Vision 30/30** is a Colombian collective business initiative of ANDI (National Association of Entrepreneurs of Colombia) that promotes the transition of Colombia towards a circular economy, through the development of strategies that increase the transformation of usable materials placed in the market, promote the inclusion of all actors in the chain and promote innovation in practices that consolidate more environmentally friendly production and consumption models.

**The National Business Association of Colombia –ANDI-** is the country’s most important non-profit organization with more than 1.400 members that represent around 50% and 55% of the national GDP. In order to respond to the challenges established by the National rulings, in terms of Extended Producer Responsibility and specifically for Posconsumer packaging waste (Resolución 1407 de 2018 and Resolución 1342 de 2020), ANDI created “Visión 30/30” as the Producer Responsible Organization (PRO) for the country.

Visión 3030 is currently gathering more than 300 organizations from 27 productive sectors in order to, collectively, lead actions around the following purposes:

1. Establishing and implementing postconsumer packaging waste recycling models that strengthen current material value chains and explore new alternatives that foster its optimization by designing scalable regional collection and transformation projects.
2. Calculate the packaging materials baseline according to the criteria defined and based on a harmonized methodology as well as a direct accompaniment to each of the member organizations with a collective approach.
3. Develop cross-sectional working groups to advance in strengthening value chains and implement a strategic agenda that fosters closed loops in a cost-effective manner and promotes participation of government, citizens and society while promoting exemplary production and consumption models in the region.
4. Develop and implement the postconsumer packaging waste management plan according to the national ruling and based on the experience on Extended Producer Responsibility from ANDI (National Business Association from Colombia)
5. Execute alliances with different economic sectors in order to transform the economic models in Colombia.
6. Foster innovation and scientific research towards the transformation of newer and more eco-friendly models in order to improve the recycling value chains of the country.
7. Implement effective communication strategies that encourage behavioral and sustainable changes in citizens and help to empower society.
8. Build capacity on inclusion strategies that increase the skills and competencies of all stakeholders and close gaps for developing a circular value chain, prioritizing on vulnerable recycling population.

#### **Prevention:**

- **National policy for the comprehensive management of solid waste (CONPES 3874 of 2016)** *National Council of Economic and Social Policy 2016 - 2030*

- **Strategy for the implementation of the Sustainable Development Goals (SDG) in Colombia (CONPES 3918 of 2018)** *National Council of Economic and Social Policy 2017 - 2030*

- **Green Growth Policy (CONPES 3934 of 2018)** *National Council of Economic and Social Policy 2018*

- **ENEC - MADS national circular economy strategy 2019 – 2030**

- **National plan for the sustainable management of single-use plastics MADS 2021 - 2030**

- **National Development Plan (PND)**  
DNP 2022 - 2026

**Governance:**

Appears to be governed by ANDI, with 27 Sector Representatives

- Agro-industrial
- Food
- Balanced Foods
- Household Items
- Cleaning Products
- Auto-parts
- Banking
- Beverages
- Cement
- Construction
- Cosmetics
- Pharmaceuticals
- Electronic Goods
- Energy
- Large Retail
- Liquor
- Metal goods
- Multiservice Chains
- Carton and Paper
- Plastics
- Hotels and Restaurants
- Insurance
- Tobacco
- Technology
- Telecommunications
- Textiles

+ 345 Producer Companies

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## 7. Cyprus

Cyprus transposed European Directive 94/62/EU into Packaging and Packaging Waste Act (N. 32 (I)/2002) in 2002. The Law introduced the Producer Responsibility for Packaging and gives two options to the companies placing packaging in the Cypriot market: to participate in a Collective Packaging Management System that has to be a not-for-profit organisation, or develop a Private System based on a Return or Deposit System.

<b>Population</b>	838,897
<b>No. of local authorities</b>	28 municipalities and about 50 communities around the island 700,000 inhabitants covered by organised Packaging Recycling System
<b>No. of companies in system</b>	830 membres
<b>Packaging introduced to the market</b>	110,000(est) tons total packaging on the market 75,000 tons total packaging registered with Green Dot Cyprus
<b>Recovered waste</b>	Recycled 21,000 tons household packaging 23,000 tons commercial industrial packaging
<b>Types of packaging</b>	Household and commercial industrial

### Legal Basis

Packaging and Packaging Waste Laws, 2002, (N32(I)/2002).

- Responsibility of the Packaging Responsible organisations by 31/12/2012 to recover at least 60% of the packaging they place in the market, recycle at least 55% of the total and at least 60% of glass, 60% of paper, 50% of metals, 22,5% of plastics and 15% of wood.
- The responsibility lies with the packagers, producers, suppliers, importers. The choices are between Private Systems based on a return or deposit scheme, or a Collective Compliance System representing many responsible producers.
- A Collective Packaging management system has to be not-for-profit.
- The Green Dot System covers both Household and Commercial Industrial Packaging.

Companies that place in the market less than 2 tons of packaging per year, are excluded from the recovery and recycling obligation and only have to report their packaging to the authorities on an annual basis.

### Packaging organisation/s in Cyprus



Green Dot (Cyprus) Public Co Ltd was founded by the Cypriot industry after an initiative at the Cyprus Chamber of Commerce and Industry in 2004, to develop a collective packaging management system. The system was accredited by the authorities in 2006 and to date it represents 831 companies and cooperates with 28 out of 30 municipalities and about 50 communities around the island, covering 85% of the population with an organised packaging recycling system.

The role of the organisation is to develop recycling initiatives with the Local Authorities and also to recover Commercial and Industrial Packaging to cover the responsibilities for packaging recovery and recycling its members, in the most environmental and economic efficient way.

The work of the organisation has been very instrumental in improving the recycling performance of the country and, the system has been achieving its recovery and recycling targets since 2010 and thereafter.

### **System Description**

Green Dot Cyprus is the first collective recycling system approved in Cyprus and is a non-profit organization.

It was established based on **the Packaging Law and Packaging Waste Law N32 (I) / 2002**, which determines the responsibility of companies for the recovery and recycling of packaging that they place on the market. It was licensed on August 1, 2006, as a packaging management system and serves more than 82% of the population of Cyprus.

At the initiative of the Cyprus Chamber of Commerce and Industry and following the enactment of the Packaging Law, in 2004, 30 large companies joined forces and set-up Green Dot Cyprus which began operations in mid-2005. The organisation was accredited by the authorities in 2006 and immediately begun recovery of Commercial/Industrial packaging. The first projects for the recovery of Household packaging begun in 5 municipalities in February 2007.

The organisation is owned by fillers, packers, retailers, distributors, raw material and packaging manufacturers and its' by Law, registered as a not-for-profit organisation. The organisation decision making bodies consist of the Shareholders Meeting, the Board of Directors with 9 members and an Executive Committee of 4 members.

The organisation also undertook to set-up and manage two other collective systems of behalf of the industry. One for the management of Waste Electrical and Electronic Equipment (Electrocyclosis) and one for the management of batteries (AFIS).

The organisation employs 17 people, while the collection, sorting and material trading operations are performed by a network of waste operators (contractors). Overall, in the network of operators, another 200 people are employed for the projects of the organisation.

### **Prevention:**

Prior to the launch of Green Dot in 2007, all waste was treated as rubbish and dumped in landfills. Cyprus was at the bottom of the European Union's recycling table. Today the situation is much better. With overall effort, Cyprus can and should become a model country in the management of Municipal Waste, even with the difficulties it faces as an island.

Better waste management requires:

- Prevention: Do not create waste.
- Reduction: reduce waste and overconsumption.
- Reuse: find creative ways to reuse products.
- Recycle: recycle all packaging from plastic, metal, paper, glass and wood.
- Energy Recovery: The waste is sent for energy recovery.
- Final Disposal: Only 10% of the waste remains for final burial.

Municipal waste production in Cyprus is high:

Green Dot 's primary responsibility lies with the management of recyclable packaging.

## **Governance**

**Legal liability** - Compliance with the legal obligations of the country

**National Responsibility** - The contribution to the creation of a good environmental image of Cyprus

**Social Responsibility** - The protection of the environment in which people and all living organisms live and develop

**Responsibility** - to ensure the future of our children

**Transparency in all our procedures** - At Green Dot, we believe that transparency and open communication between management, employees and shareholders are key to achieving our goals.

Consistent with this principle, we are constantly developing structures and mechanisms that allow us to communicate, to share, to participate.

**Code of Business Ethics** - Ensuring transparency and preventing corruption in all our activities is an essential issue for us. Thus, we apply the Code of Business Ethics. This Code includes all the principles and rules that guide our internal processes, but also our relations with our partners and state authorities. Management, executives, shareholders and employees are all committed to enforcing these rules. In addition, we extend the validity of the Code to our partners.

**Board of Directors** - The Organization has a nine-member Board of Directors. Six of the members of the Board represent the companies and are elected by the General Meeting of Shareholders (Class 'A'). The other three Members represent and are appointed by the CCCI (Class 'B'). One of the six Members representing the companies is elected as President by the Council itself.

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## 8. Czech Republic

In the Czech Republic are municipalities technically and also legally responsible for household waste collection and sorting. There is one Packaging recovery organization – EKO-KOM. This organization does finance costs of municipal separate collection of packaging waste from households. The collection network is currently made up of more than 241 thousand containers for separate collection of paper, plastic, glass and beverage cartons and also partly for metal.

<b>Population</b>	10.5 mil.
<b>No. of local authorities</b>	6,251 municipalities (6,073 covered by system) 99% inhabitants covered by system
<b>No. of companies in system</b>	20,277 membres
<b>Packaging introduced to the market</b>	2,979,976 tons total amount of licensed packaging 921,799 tons of one-way licensed packaging
<b>Recovered waste</b>	Recycled 690,047 tons packaging waste
<b>Types of packaging</b>	Household and commercial

### Legal Basis

Directive EC/94/62 about packaging and packaging waste

1997-2001

- **Waste Act no.125/1997** – §18 and §19
- “Semi-voluntary” take-back and recovery obligations.
- **Regulation form of the Ministry of Environment**
- **nr. 338/1997** – recovery rate of packaging
- **Government Act 1999** – list of recovery packaging
- “Voluntary Agreement” between Ministry of Environment and CICPEN

2002

- **Packaging Act 477/01** – takes effect on January 1, 2002
- 28. 03. 2002: EKO-KOM Authorisation
- Ministry of Environment directs a new condition for **AUTHORIZED PACKAGING COMPANY**
- New obligation from the certificate of authorization è new Contracts with companies and municipalities, new fees, and subsidies structure, new reporting system

**Directive EC 2004/12 about packaging and packaging waste**

2004

- **Amendment 94/2004**– takes effect on March 3, 2004

2006

- **Amendment 66/2006** – takes effect on March 15, 2006

## Packaging organisation/s in Czech Republic



Integrated Recovery System EKO-KOM was created by industry to handle recovery of both household and business-to-business packaging. While collection of industrial packaging is organized mainly through business channels, household packaging is collected and recovered as an integrated part of municipal waste. To ensure this system, EKO-KOM is co-operating on contractual basis with more than 6,000 municipalities.

The Financial income of EKO-KOM comes from fillers/producers/importers who do conclude contracts with EKO-KOM. Payments to EKO-KOM are based on quarterly reported amount of packaging placed to the market in tons. Different payments are due to compliance scheme per ton of packaging depending on packaging material and packaging purpose (household and industrial packaging do differ substantially).

All EKO-KOM income is used to ensure packaging waste recovery as EKO-KOM is a non-profit company. Main part of income is used to cover additional costs incurred in municipalities.

### System Description

**The EKO-KOM System** provides collection and recovery of packaging waste mainly through municipal schemes of separate collection. This solution is based on legal framework given by the czech packaging and waste law:

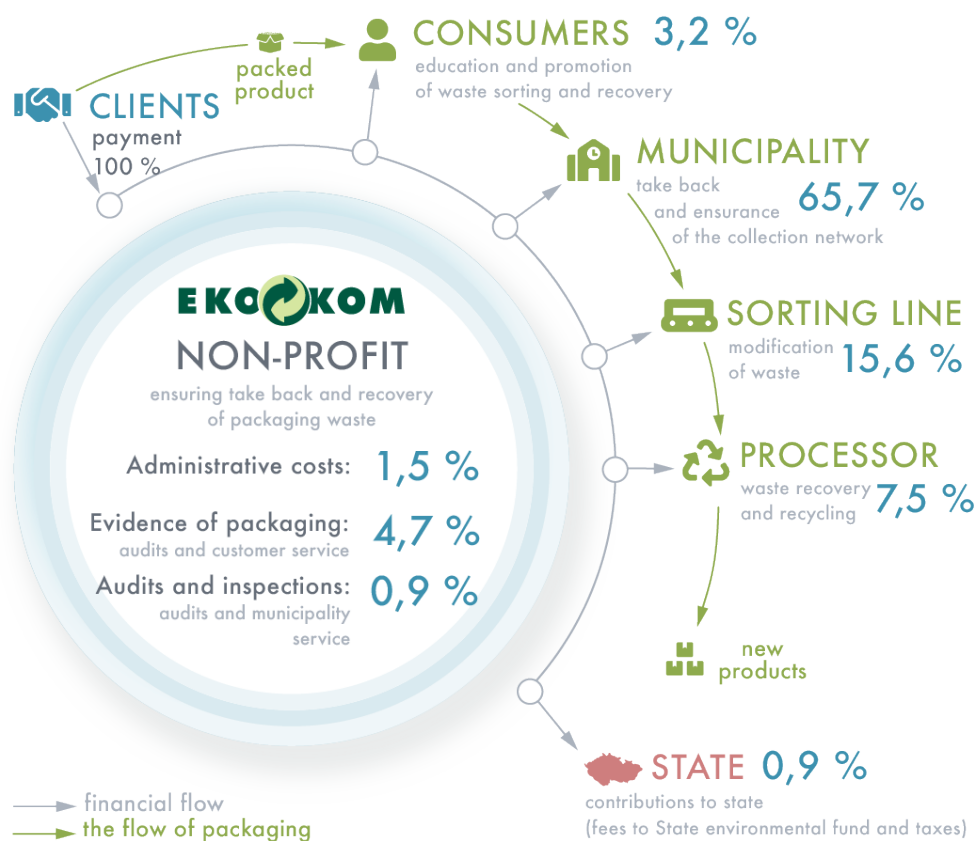
- Producers, importers, fillers, and distributors of packaging and packaged products shall ensure the collection and recovery of packaging waste. They co-finance costs of municipal separate collection of waste through the EKO-KOM System.
- Based on the Waste Act, the municipalities shall separate and recover waste. Part of sorted components of municipal waste is also consumer packaging, which should be recovered.

**EKO-KOM** company is obliged to offer the same terms of service to any economic operator interested to participate in the compliance scheme and the same time to offer the same terms of support to any municipality interested to participate in the packaging collection and recovery system.



The authorized packaging company **EKO-KOM** operates a nationwide system that provides take back and recovery of packaging waste – in accordance with the Packaging Act. No. 477/2001 Coll.

The **EKO-KOM System** is based on the cooperation of industrial enterprises (clients), towns and villages. The system ensures that waste from packaging used by the consumer is sorted out, transported by refuse collecting vehicles, finally sorted and used as a secondary raw material.



### How does it work?

Way of the packaging waste and the pattern of distribution of remuneration in the EKO-KOM System

**The green arrows** show the path of packaging: consumers will buy the product and then will throw packaging into the color container for sorting waste. Collecting companies transport sorted packaging waste to the sorting line, where the waste is further categorized according to the different types of further processing. This modified waste goes to the processors, where recycled products are produced – this way the sorted PET bottles can returns to you as a new cycling jersey ...

**The grey arrows:** In 2021, 98.5% of the annual costs of authorized packaging company EKO-KOM, a.s. were used to ensure collective compliance. Specifically, the breakdown was as follows: more than 83% was accounted for by the direct costs of waste activities (collection of packaging and provision of a collection network in municipalities, collection and recovery of industrial packaging, re-sorting of packaging waste, direct support for recycling of packaging waste). And given that municipalities and their inhabitants are key to the sorting of packaging waste, municipalities are responsible for the largest share. Direct payments to the participating municipalities for providing packaging waste take-back and collection networks and for delivering it through collection companies for re-sorting and treatment accounted for 63.5% overall in 2021. The level of rewards to municipalities depends mainly on the amount of waste sorted and increases with the efficiency of the collection system. Almost 20% of the total costs of the system were the costs of re-sorting packaging waste, the costs associated with the collection and recovery of industrial packaging waste and the direct promotion of recycling and recovery of packaging waste.

**Almost 8% of the costs (7.7%) had to be spent on the creation of the statutory reserve.** In the past, a capital reserve was built up, which was then used, for example, to cover the extra costs of authorized packaging companies for the collection and recycling of packaging waste in the event of unexpected falls in the price of secondary raw materials. According to the new legislation, the creation of a reserve for the authorized packaging company is mandatory. This obligation is laid down in Section 21a of Packaging Act No 477/2001 Coll., where it is directly stated that *“The authorised company shall be obliged to create a reserve intended to cover the future costs of the combined fulfilment of the obligations of persons placing packaging on the market or in circulation, taking into account the financial risks involved, the aim of which is to ensure the continuity and availability of the provision of services by the authorised company.”*

The amount of this legal reserve is to be at least 50 % of the total costs of the authorised company by 2025. Therefore, before the reserves reach this level, their creation will be a necessary and significant part of the system costs.

**The cost** of ensuring that all packaging and waste flows are conclusively recorded, including their control and regular audits, was 4.8% last year. Less than 3% of the costs were spent on mandatory awareness raising, environmental education of schoolchildren, consumer information and other activities leading to correct and efficient waste sorting in the Czech Republic. Own administrative and management costs amounted to 1.3% and statutory levies on the State accounted for 0.1% of the total costs.

## Prevention

### Waste sorting companies

Waste service providers have an irreplaceable function in management of separated waste because they assure physical handling of separated waste and its transport to sites for further processing. Waste service providers are integrated in the system indirectly through municipalities, or directly on the basis of a contractual relationship.

### Waste sorting companies

Waste sorting companies are also partners of the EKO-KOM System. Utilisable components of municipal waste and other packaging waste are separated into reusable materials on their lines. The technological development of the separation lines is very important for subsequent utilisation of waste as reusable material in the processing industry. The systems for waste recovery and collection in municipalities are also affected to a certain degree by the requirements waste recovery subjects place on the quality of the input materials.

### Waste recycling companies

Waste recycling companies use reusable materials from waste as material for production of their own new products and their requirements concerning the quality of reusable materials influence the activities of waste recovery facilities. Processors include glassworks, paper mills, manufactures of artificial fibres, manufactures of plastic products, etc.

## Governance:

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## 9. Denmark

### Packaging organisation/s in Denmark



**VANA** is a Producer Responsibility Organisation (PRO) for companies who will be covered by the producer responsibility for packaging. We take on the practical, financial and legal responsibility for the producer responsibility on behalf of our members.

**VANA** was founded for the business community by the business community.

**VANA** was founded and is supported by Denmark's largest trade and business organisations, whose members number approx. 80% of the companies that are covered by the producer responsibility for packaging. The trade and business organisations cover all industries.

**Landbrug & Fødevarer** (the Danish Agriculture & Food Council), **DagSam** (The Grocery Industry's Cooperation Committee), **Dansk Erhverv** (the Danish Chamber of Commerce) and **Dansk Industri** (the Confederation of Danish Industry) founded **VANA** in 2021 to help Danish companies take responsibility for the extended producer responsibility in an environmentally correct, administratively simple, and cost-effective manner.

### System Description

**VANA** was founded as a collective scheme in November 2021 by 4 trade organizations, Danish Agriculture & Food Council, DagSam (The Danish Merchants), The Danish Chamber of Commerce and the Confederation of Danish Industry.

The 4 business organizations anchor VANA broadly among their respective members. We thus represent approximately 80% of Danish companies and cover all industries.

VANA's founders therefore also recommend that their members choose VANA as a collective arrangement to help manage their obligations legally, financially, and practically in relation to producer responsibility for packaging in Denmark.

VANA was established to ensure the reuse and recycling of billions of pieces of packaging each year on behalf of thousands of companies. We follow packaging from production and packaging, via consumers, through collection and sorting and all the way to recycling in new products. This gives us unique expertise in how packaging can most effectively be given a new lease of life. VANA does this for the benefit of the businesses that depend on using packaging responsibly, the environment and the individual consumer.

VANA's 117 members are among the largest players on the market. It is an advantage for all our members; for the more members we have and the larger the amount of waste we handle, the lower the costs for operation and administration for everyone, and the greater VANA's bargaining power with the actors throughout the value chain.

VANA works closely with producers, authorities and the recycling industry to jointly break the packaging waste curve. Together we will ensure that overall packaging consumption is reduced and much more packaging is reused or recycled.

VANA collaborates widely with relevant actors throughout the value chain to create the best conditions so that you can meet your obligations under producer responsibility - both in Denmark and internationally. At VANA, we handle the actual framework and operation of producer responsibility in Denmark, and our partnerships give you the opportunity to choose a solution that fits in with your business structure and systems, if you need help with e.g. data management or international compliance.

## Data handling and international compliance

The partnerships entered into between VANA and the respective players (e.g. for data handling and international compliance, GS1, LORAX EPI, recyda, and VAREFAKTA KONTROLLERET) are not financially binding. The collaborations you may wish to enter into with an actor for the purpose of handling and declaring your obligations in addition to VANA's services are thus an agreement exclusively between your company and the chosen actor.

VANA offers direct integration to our member portal for reporting to the Danish market through our collaboration partners. Through the partnerships, VANA validates i.a. the automated environmental calculation for the Danish market, which several of our partners offer. Through the partnerships, we also ensure mutual knowledge sharing and sparring for the benefit of our members.

At VANA, we collaborate with the leading collective schemes throughout the Nordics to share experiences and knowledge about extended producer responsibility across the Nordic borders.

## Terms and conditions when registering with VANA

The following describes the conditions that you as a company are covered by when you register with VANA.

For more information about membership, please see [Membership | Vana](#)

Company name publicly available. It is a requirement that VANA, as a producer responsible organization, publishes the names of the companies for which we are responsible. Your company name will therefore appear on our website. If you would like your logo to also appear, it can be sent to [medlemsservice@vana.dk](mailto:medlemsservice@vana.dk).

## Prices

When joining VANA, there is a one-time payment of:

- Start-up contribution to VANA of 4000 DKK (2000 DKK Companies below the triviality limit)
- Registration fee to Danish Producer Responsibility of 1000 DKK (500 DKK for companies who are already registered in DPA due to another product category)

Before the producer responsibility enters into force on the 1st of July 2025, there will be an advance payment as well as a possible guarantee, depending on the legislation, please see [Status and legislation | Vana](#). When the producer responsibility enters into force, the total price will consist of payment for waste treatment including administration and fees to the authorities for clean-up, awareness raising measures, and reporting.

Terms of payment - Terms of payment is 14 days.

Notice and resignation - Resignation can be done with 12 months' notice to a 1st of January, however, see below. Until the obligation to register enters into effect on the 1st of April 2024, resignation may take place with immediate effect. After the obligation to register has entered into effect resignation can only take place with 12 months' notice to a 1st of January, from the time the producer responsibility has come into force, which means with effect from the 1st of January 2027.

## Governance

VANA's board consists of 8 members - 2 from each of the 4 founding organisations: Agriculture & Food, Dagsam, Dansk Erhverv and Dansk Industri.





- Chair, Deputy Director Danish Industry
  - Vice Chairman, Journalist and Commentator from Daytime
  - Chief Consultant, Danish Business Authority
  - Deputy Director, Danish Business Authority
  - Environmental Executive, Danish Agriculture & Food Council
  - International Manager, Danish Agriculture & Food Council
  - Branch Director / Trade Director, Danish Food & Drink Federation
  - CEO, MLDK – representing branded suppliers
-

## 10. Estonia

Population

1.315 mil.

### Packaging Waste Recovery and Recycling in Estonia (2020 data)

Deposit Return System	Non-Deposit System	
<ul style="list-style-type: none"> <li>Eesti Pandipakend OÜ</li> </ul>  <ul style="list-style-type: none"> <li>100% market share</li> <li>12 700 t recycled</li> </ul>	<ul style="list-style-type: none"> <li>Eesti Pakendiringlus OÜ</li> </ul>  <ul style="list-style-type: none"> <li>48% market share</li> <li>49 880 t recycled</li> </ul>	<p><b>Packaging from:</b> Private consumers; Industrial and retail customers</p>
<p><b>Packaging of:</b></p> <ul style="list-style-type: none"> <li>Soft drinks</li> <li>Water</li> <li>Beer, cider</li> <li>Low ethanol content beverages</li> <li>Juices and nectars, concentrates</li> </ul>	<ul style="list-style-type: none"> <li>Tootjavastutusorganisatsioon OÜ</li> </ul>  <ul style="list-style-type: none"> <li>22.5% market share</li> <li>28 496 t recycled</li> </ul>	<p><b>Packaging types:</b> Sales packaging; Group packaging; Transport packaging</p>
	<ul style="list-style-type: none"> <li>Eesti Taaskasutusorganisatsioon MTÜ</li> </ul>  <ul style="list-style-type: none"> <li>29.5% market share</li> <li>29 970 t recycled</li> </ul>	<p><b>Packaging materials:</b> Plastic, metal, paper-cardboard, wood, glass</p>

### Legal Basis

The Packaging Act introduced in June 2004 sets recovery targets for all packaging placed on the market and deposit system for one way packaging of beer, alcohol drink with low ethanol content and soft drinks in glass, plastic and metal packaging as of January 1, 2005.

The existing norms of the Packaging Act require collection and recovery of 50% of total packaging put in the market by packaging operator (packer and importer) in 2004, up to 2010 – 60%, and from 2012 – to comply with all EU norms.

The introduction of the Packaging Act has also triggered introduction of Compliance Scheme in Estonia. The packaging recovery organization, called “Estonian Recovery Organization” has been established by producers, importers and retailers operating in Estonia.

According to the Packaging Act the number of recovery organizations is not limited, but they have to fulfil requirements and get a license for operation from Estonian Ministry of Environment. The law says that all manufacturers, packers and importers are entitled to transfer the fulfilment of packaging recycle norms to a non-governmental organization established by themselves. If producers or importers haven not joined such organization, they have to organize recovery of their packaging themselves.

### Packaging organisation/s in Estonia

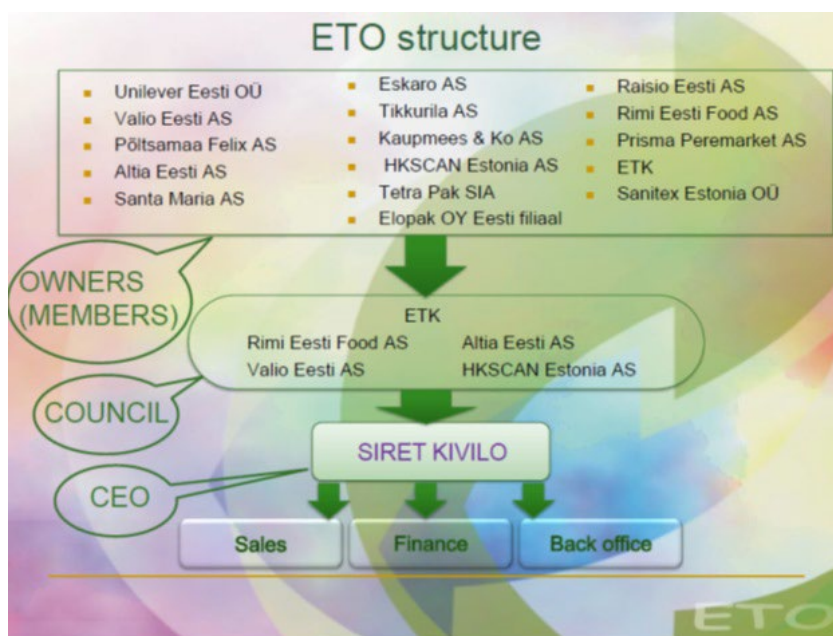


The Estonian Recovery Organization (ERO) came into force on July, 2004. ERO is a non-profit organization and does not share profit among its owners. All profit is reinvested to the collection and recovery for decreasing total costs.

ERO's mission is to help packaging operators to fulfil Packaging Act economically reasonable, socially acceptable and environmentally effective way.

ERO's aim is to transfer packaging operator's obligation to organization. ERO represents the interests of its members/clients in cooperation with public institutions.

The scope of responsibility is to collect and recover its clients' packaging waste and to guarantee reporting for Packaging Register. ERO is not responsible for packaging circling in the deposit system.



The highest decision making body is General Meeting which nominates board for 2 years. Board is responsible for fulfilment of ERO's targets. The Board consists of 6 members. To achieve its goals, board has formed office and hired Managing Director. Managing Director runs ERO with 6 employees.

ERO is a collaborative industry body through which businesses work together to achieve the recovery and recycling of packaging waste. Membership is open to all types of obligated companies including manufacturers, converters, packer/fillers, sellers and also all sectors of industry. It aims to take the pressure away from businesses that would find it difficult and time consuming to comply with any legislation on an individual basis.

## System Description

Non-Profit Organisation Eesti Taaskasutusorganisatsioon (ETO) is the first accredited producer responsibility organisation in Estonia engaged in the selective collection and recycling of packaging waste since 2004. ETO is connecting obliged industry from several fields of business activities: producers of packaging products, importers, retail trade and producers of packaging.

ETO is a member of the Packaging Recovery Organisation Europe PRO EUROPE and the Extended Producers Responsibility Association EXPRA.

ETO customers have the right to use The Green Dot (der Grüne Punkt) marking on packaging in Estonia. The Green Dot on the packaging means that for such packaging a financial contribution has been paid to a qualified national packaging recovery organisation that has been set up in accordance with the principles defined in European Packaging and Packaging Waste Directive 94/62 and the respective national law.

**The Estonian Packaging Act** stipulates a **definition of packaging obliged industry** as following: packaging undertaking means any person who packages, imports, or sells packaged goods within their economic or professional activities.

Producers and importers have to keep in-house records on packaging materials and their quantities. Producers and importers are responsible for taking back and recovering their packaging waste according to the required amounts in packaging and packaging excise tax legislation.

Packaging companies can fulfil the take-back and recovery obligations individually or join an accredited packaging organisation MTÜ Eesti Taaskasutusorganisatsioon (ETO). ETO is collecting packaging waste nationwide in cooperation with waste operators.

ETO service fees cover all costs of collection, sorting, transport and recovery costs.

**Packaging Act** stipulates **packaging** as all products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer. Non-returnable items used for the same purpose are also considered to constitute packaging.

**The types of packaging material are the following:**

- 1) glass means all fused inorganic glass types which belong to Chapter 70 of the Combined Nomenclature pursuant to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff (OJ L 256, 7.9.1987, p. 1–675);
- 2) plastic means all natural and artificial polymer-based materials in both single and multi-layer embodiment which belong to Chapter 39 of the Combined Nomenclature pursuant to Council Regulation (EEC) No 2658/87;
- 3) metal means steel which belongs to Chapter 73 of the Combined Nomenclature, aluminium which belongs to Chapter 76 of the Combined Nomenclature, and other metals which are used as packaging materials and belong to Section XV (Base metals and articles of base metal) of the Combined Nomenclature pursuant to Council Regulation (EEC) No 2658/87;
- 4) paper and paperboard, including composite paperboard, which belongs to Chapter 48 of the Combined Nomenclature pursuant to Council Regulation (EEC) No 2658/87;
- 5) wood;
- 6) other material.

**Classes of packaging:**

- 1) sales packaging or primary packaging means part of a sales unit designated to be handed over to the end-user or consumer at the place of sale.
- 2) grouped packaging or secondary packaging is meant for grouping a certain number of sales units at the place of sale regardless of whether the grouped packaging is sold as such to the end-user or consumer or whether it serves only as a means to facilitate the handling of goods, or protection or presentation of goods, whereas grouped packaging can be removed from the product without affecting its characteristics;
- 3) transport packaging or tertiary packaging is meant for handling and transport of a certain number of sales units or goods in grouped packaging in order to prevent transport damage, whereas transport packaging does not include road, rail, sea and air containers.

**Depending on the possibility of reusing packaging, the subclasses of packaging are as follows:**

- 1) reusable packaging is intended and designed to pass at least several rotations or circles in the reuse system during its life cycle, depending on the intended use, possibility, and fitness for the use of the packaging;
- 2) non-reusable packaging is meant only for single use.

**Prevention**

Calculation of packaging mass is imposed on the production of packaging goods placed on the market in Estonia or acquired and imported in the event of the sale, exchange, transfer without charge or use for self-consumption of the packaging.

## AMOUNT OF PACKAGING PLACED TO THE MARKET = IMPORT – EXPORT + PRODUCTION OF PACKAGING PRODUCTS

For determination of packaging mass there should be counted together mass of packaging along with any components and additional elements attached to the packaging such as lids, caps, corks, seals, labels, safety strips, clips, etc., without the goods contained therein.

The total mass of the packaging placed to the market shall be determined to the nearest 1 kg.

If the packaging consists of various materials and these materials can be manually separated, the mass of packaging shall be determined separately for every type of packaging material to be separated, except if the parts to be separated constitute less than 10% of the total mass of packaging. In this case, the mass of the components and additional elements of packaging shall be counted among the mass of the class of the dominant packaging material.

Reusable packaging is not subject of reporting as long as reused.

### Governance

**Non-Profit Organisation Eesti Taaskasutusorganisatsioon (ETO) is the first accredited producer responsibility organisation in Estonia engaged in the selective collection and recycling of packaging waste since 2004.**

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### **ETO ownership consists of 17 companies:**

Tetra Pak SIA - packaging  
 Elopak OY Eesti filiaal – sustainable packaging  
 Unilever Eesti AS – branded consumer goods  
 Valio Eesti AS – dairy products  
 Orkla Eesti AS – branded food and drink products  
 Altia Eesti AS – alcoholic beverages  
 AS Santa Maria – food manufacturing  
 Eskaro AS – paint manufacturing  
 Tikkurila AS – paint manufacturing  
 Kaupmees & Ko AS – food and consumer goods wholesaler  
 Raisio Eesti AS – healthy and responsibly produced food and ingredients  
 Rimi Eesti Food AS – leading retail chain  
 Prisma Peremarket AS – food and consumer goods retail  
 Coop Eesti Keskühistu – retailing co-operative  
 Sanitex OÜ – food and beverage distributor  
 Maag Eesti AS - marketing, warehousing and distribution of chilled and frozen food products  
 Estko AS – environment-friendly cleaning products

## **Council and Board**

Member of the Board: CEO of Estonian Recovery Organisation

Council Members:

Co-op Eesti Keskühistu (chair of the Council)

Altia Eesti AS

Rimi Eesti Food AS

Maag Eesti AS

Valio Eesti AS

## **Partners**

Ragn-Sells AS - waste management, environmental services and recycling

Eesti Keskkonnateenused AS – rubbish collection service

Väätsa Prügila AS - landfill site and waste management treatment centre owned by 10 municipalities

Paikre OÜ – waste management service

Nordic Paper OÜ – pulp and paper

Uikala Prügila AS – recycling plant

VarmaPartner OÜ – waste disposal equipment

Epler&Lorenz AS – hazardous waste collection and incineration

Kesto OÜ – hazardous waste collection

RP Pakend OÜ – collection and recycling of packaging waste

Prügimees OÜ - collection of non-hazardous waste

Metrosystem OÜ – pallet handling

Absolut Ehitus OÜ - equipment supply

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## 11. Finland

<b>Population</b>	<b>5.5 mil.</b>
<b>No. of local authorities*)</b>	<b>320 municipalities (99% covered by PYR) 99% inhabitants covered by system</b>
<b>No. of companies in system</b>	<b>4,800 members (over 90 % of obliged industry)</b>
<b>Packaging introduced to the market 2012</b>	<b>2.2mil. tons total amount of licensed packaging</b>
<b>Recovered waste 2012</b>	<b>1.5mil. tons reused 59% recycling rate 715,700 tons packaging waste was collected</b>
<b>Types of packaging</b>	<b>Household**) and commercial</b>
<p><b>*) 1.1.2016 (Region of Aland excluded)</b>  <b>**) Consumer packaging take-back scheme in use 1.1.2016</b></p>	

Producer responsibility for packaging will be extended in Finland when the obligation for organising the take-back of consumer packaging is transferred from municipalities to producers at the beginning of 2016. The Finnish Council of State approved a new decree for packaging and packaging waste in July 2014. The decree stipulates that producers will have to take back fibre, metal and glass packaging at a minimum of 1850 take-back points and plastic packaging at 500 take-back points. In addition, more stringent targets have been placed on the reuse of packaging and the recycling of packaging waste.

### Producer responsibility for packaging

Producer responsibility for packaging applies to producers or firms that pack or import packed products for the Finnish market and have a turnover of EUR 1 million or more. Firms may transfer their legal obligation to producer organisations by making a contract with the Finnish Packaging Recycling RINKI Ltd. By making just one contract with RINKI a firm simultaneously becomes a member of the respective producer organisations responsible for attaining the recycling targets for fibre, metal, plastic, glass and wooden packaging.

### Consumer packaging take-back scheme

Planning of the take-back scheme is progressing rapidly in Finland. Take-back will be organised by the Finnish Packaging Recycling RINKI Ltd. This is the result of a joint decision taken on 26 May, 2014 by the producer organisations: Mepak-Kierrätys Oy (metal), Suomen Keräyslasiyhdistys ry (glass), Suomen Kuitukierrätys ry (fibre) and Suomen Uusiomuovi Oy (plastic). In addition, Suomen Keräyslasiyhdistys Oy and RINKI Ltd have agreed that RINKI Ltd will organise glass recycling. EPR will enter into force in May 2015. The waste take-back network must be in operation in January 2016.

### Legal Basis

EU DIRECTIVES ON WASTE AND ON PACKAGING AND PACKAGING WASTE TRANSPOSED INTO FINNISH LAW

The recovery of packaging must be implemented in compliance with the targets that the EU has confirmed with Finland.

EU directives on waste and on packaging and packaging waste have been transposed into Finnish law through the Waste Act 1072/1993 and the Council of State Decision on Packaging and Packaging Waste 962/1997 and the Council of State Decrees 987/2004 and 817/2005.

Waste legislation was amended by the Waste Act amendment 452/2004 through the addition of Chapter 3a concerning producer responsibility. This amendment has formed the basis of producer responsibility for packaging as of 1.9.2004. The most important duties relating to reuse and recovery are based on the aforementioned Council of State Decision 962/1997 and Decree 817/2005.

The revised Waste Act 646/2011 came into force on 1.5.2012. The Council of State Decree on Packaging and Packaging Waste 518/2014 came into force on 3.7.2014.

### **Packaging organisation/s in Finland**



The Finnish Packaging Recycling RINKI Ltd. is a non-profit firm, operating in conjunction with producer organisations in the packaging sector. It helps firms registered with RINKI and the authorities to fulfil packaging recovery obligations economically and easily.

The highest decision-making body is General Meeting which nominates board for 2 years. Board is responsible for fulfilment of ERO's targets. The Board consists of 6 members. To achieve its goals, board has formed office and hired Managing Director. Managing Director runs ERO with 6 employees.

ERO is a collaborative industry body through which businesses work together to achieve the recovery and recycling of packaging waste. Membership is open to all types of obligated companies including manufacturers, converters, packer/fillers, sellers and also all sectors of industry. It aims to take the pressure away from businesses that would find it difficult and time consuming to comply with any legislation on an individual basis.

### **System Description**

The Finnish Packaging Recycling RINKI Ltd operates in conjunction with the producer organisations for the packaging sector. It assists firms registered with the company and the authorities to fulfil the obligations pursuant to the EU packaging directive and corresponding Finnish legislation economically and easily. By making a contract with RINKI a firm transfers the recovery obligations for the packaging it has placed on the market to the producer organisations. The firm does not then have to take care of packaging recovery at its own costs or to report to the authorities on how it has arranged recovery. The producer organisations are responsible for the attainment of recovery targets.

Recovery is funded through recovery fees invoiced by RINKI and deposited without deductions into the accounts of the producer organisations. RINKI's operations are funded through registration and annual fees paid by the registered firms. Both RINKI and the producer organisations are non-profit organisations.

## THE FINNISH PACKAGING RECYCLING RINKI LTD

- registers firms that have placed packaging on the market in Finland together with their products and have made a contract with PYR.
- compiles statistics on the packaging materials and quantities annually reported by registered firms.
- invoices the packaging material-specific recovery fees as authorised by the producer organisations.
- reports to the authorities on the packaging statistics compiled by the company and on registered firms. The statistics are only shown in total quantities. The Finnish Packaging Recycling RINKI Ltd does not forward any data on individual firms.
- offers advice on matters pertaining to recovery.
- provides information.
- protects the interests of packer.

Producer responsibility for packaging will be extended in Finland when the obligation for organising the take-back of consumer packaging is transferred from municipalities to producers at the beginning of 2016. The Finnish Council of State approved a new decree for packaging and packaging waste in July 2014. The decree stipulates that producers will have to take back fibre, metal and glass packaging at a minimum of 1850 take-back points and plastic packaging at 500 take-back points. In addition, more stringent targets have been placed on the reuse of packaging and the recycling of packaging waste.

### Producer responsibility for packaging

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### Prevention

Almost all products are packaged in some kind of packaging. Packaging protects products from the environment and also the environment from the products.

Empty packaging must be recycled, of course. This way, it can then be used as a raw material for the manufacture of new products, which saves energy and natural resources and mitigates climate change. Sorting and recycling are part of sustainable consumption; they are eco actions we can all include in our daily routines.

## BASIC STUDIES

Packaging comes in different sizes, designs and materials. All types of packaging serve the same purpose: they do their best to protect products. When the packaging has done its job, it needs to be recycled. Your nearest recycling container can be found either at the building where you live or [at a Rinki eco take-back point](#).

Dirty packaging must not be put into recycling containers, but rinsing the packaging is enough. A good rule of thumb is for the packaging to be clean enough for you to store it at home without it starting to smell. It is better

to put very dirty used packaging into a mixed waste bin. Please remember that each recycling container is meant for consumer packaging waste made of a specific material, so don't put any other materials in them.

## Advanced Studies

Recycling is not rocket science and its benefits are also quite easy to understand. Benefits for the environment: it is important to keep materials in circulation for as long as possible. When we recycle packaging, we reduce the collection, transport and handling of new raw materials, which, in turn, saves energy. And when we decrease our energy consumption, we also generate less carbon dioxide. Recycling is perhaps the easiest way to fight climate change.

Benefits for you: you save money by sorting and recycling, as emptying a mixed waste bin is more expensive than other waste. The most valuable thing, however, is feeling that you have done your bit for the well-being of our planet.

The statutory recovery obligations for packaging apply to packers and importers of packed products with a turnover of EUR 1m or over.

Recovery activities are financed through recovery fees, which RINKI invoices and deposits in the producer organisation's accounts without reductions. RINKI's operations, on the other hand, are financed through registration and annual fees paid by registered firms. Both RINKI Ltd and the producer organisations are non-profit organisations.

RINKI Ltd's registration and annual fees are based on the firm's turnover. Firms that have combined several locations in one contract receive a discount on their registration and annual fees.

Recovery fees are set by the producer organisations. The invoices sent to firms are based on the packaging quantities declared to RINKI by packers and importers for the previous year.

## Registered companies

When a company joins the producer responsibility scheme, it transfers the management of its producer responsibility for packaging to the packaging sector producer organisations. More than 4,600 companies have signed the contract.

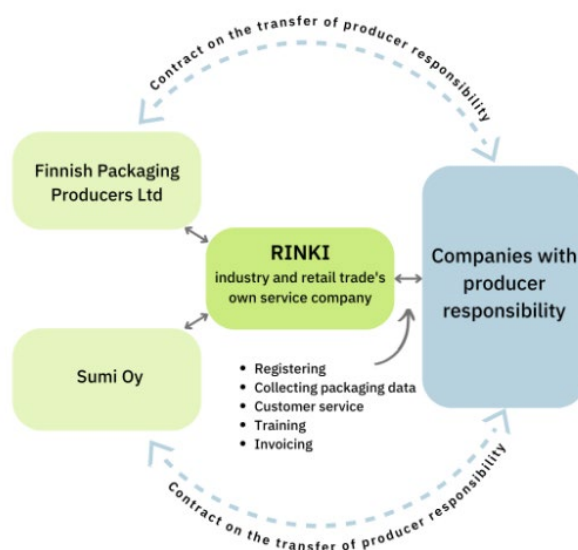
## Play your part in a greener future. We will help you.

**Producer responsibility is taken care of by signing a contract with a packaging producer organisation. You can enter a contract by contacting Rinki.**

There are two packaging sector producer organisations in Finland: Finnish Packaging Producers Ltd and Sumi Oy. Both are responsible for the collection and recycling of carton and paper, glass, metal, plastic and wooden packaging in Finland.

Registering is easy:

1. Choose below, which producer organisation you wish to join.
2. Send the contract to Rinki.



**Finnish Packaging Producers Ltd**

Finnish Packaging Producers Ltd (SPT) is a non-profit organisation, organising the recycling of carton and paper packaging, glass packaging, metal packaging, plastic packaging and wood packaging waste.

[Read more about SPT here:](#)

[FINNISH PACKAGING PRODUCERS LTD →](#)
[JOIN SPT →](#)

**Sumi Oy**

Sumi Ltd is responsible for the collection and recycling of plastic, glass, metal, paper and carton as well as wooden packaging in Finland.

[Read more about Sumi here:](#)

[SUMI LTD →](#)
[JOIN SUMI →](#)

## Producer responsibility is teamwork

### Producer organisations

- There are two producer organisations in Finland: Finnish Packaging Producers Ltd and Sumi Oy.
- Both producer organisations take care of collecting and recycling carton, paper, glass, metal, plastic and wooden packaging in Finland.
- All companies with producer responsibility are legally obliged to join one of the producer organisations. Companies can be customers of both producer organisations simultaneously until 2025 if they have had a contract prior to 30.9.2022.
- The producer organisations ensure that the producer responsibility obligations of companies with producer responsibility are taken care of. The producer organisations organise the recycling of packaging placed on the Finnish market and the collection of consumer packaging in Finland.
- The producer organisations maintain packaging waste reception terminals in Finland.

### Rinki

- Rinki is a service company authorised by the producer organisations to register and manage contracts with customers.
- Rinki offers customer service for business customers on behalf of the producer organizations. Ring's business customer service is available at 09 6162 3500 (weekdays 8.30-15.30) on/off.
- Rinki informs companies with INFO and FOCUS newsletters.
- The company concludes the contract with the packaging sector producer organisations. The contract is made by contacting Rinki. By signing the contract, companies transfer their producer responsibility for packaging to the producer organisations.

- Companies with producer responsibility report their packaging data to Rinki
- Rinki collects recycling fees from companies and passes the recycling fees on to the producer organisations.



### **SPT – the largest recycler of packaging in Finland**

Finnish Packaging Producers Ltd is a non-profit producer organisation that promotes circular economy. We serve companies in the packaging industry as the first and leading recycler of all types of packaging in Finland.

We take care of our customers' producer responsibility obligations and organise the collection and recycling of all packaging in cooperation with waste management operators.

SPT carries out the producer responsibility activities previously handled by the four packaging-material-specific producer organisations (paper fibre, metal, glass and wooden packaging), with plastic packaging added as a new material. This means that our strengths include our long experience as well as efficient, customer-oriented and continuously developing operating models.

- Established in 2021, registered in 2022.
- Recycles approx. 90% of packaging in Finland.
- 4,700 member companies. Turnover EUR 30 million.
- Owned by companies in the retail and industry sectors that widely represent the packaging industry.

### **A leader in packaging recycling**

Established in 2021, Finnish Packaging Producers Ltd is Finland's largest producer responsibility organisation. We provide services for all types of packaging recycling to our client companies, and also help them fulfil their producer responsibility obligations. FPP was entered into the Producer Responsibility Register on 29.9.2022. Since then, we've continued the activities of the previous producer organisations.

We work with waste management operators and authorities to ensure that packaging recycling targets are met and recycling statistics are reliable and transparent.

### **Shareholders**

Alko Oy – alcohol retailing

Arla Oy – world leading dairy company

Corex Finland Oy – manufacture of high-quality cardboard cores for paper, cardboard and plastics

Earthpack Oy – new and used pallets and wooden packaging

Elintarviketeollisuusliitto ry - Finnish Food and Drink Industries' Federation

Emballator Metalpak Oy – producer of plastic, metal, and aluminium packaging

Encore ympäristöpalvelut Oy – recycling services – part of STENA RECYCLING

Finn-Korkki Oy – producer of caps and closures

Huhtamaki Foodservice Finland Oy – food packaging supplies and materials

Lakan Betoni Oy – produce aggregate based building materials and services

Onni Forsell Oy - washing and refurbishing of drums and IBC containers

Oy Karl Fazer Ab – creating magical food experiences; bakery, confectionary, and lifestyle foods

Paketo Oy - recycling, sale and renovation of IBC containers and barrels

Paroc Oy Ab – producer of stonewool; durable, energy efficient, fire, and moisture resilient materials

Puusepänteollisuus ry – represents the construction and furniture carpentry industries

Päivittäistavarakauppa ry - represents grocery retail and foodservice wholesale companies  
RASI ry – representing communities of entrepreneurs in construction and decoration  
Ravintoraisio Oy – producer of flour, cereals, and prepared grains  
Saint-Gobain Finland Oy – pallet, packaging, and recycling services  
Sonoco-Alcore Oy - consumer packaging, industrial products and packaging supply chain services.  
Stora Enso Oyj – world leader in renewable materials for packaging, biomaterials, and construction  
Suomen Aerosolijhdistys ry – Finlands Aerosolförening rf - aerosols  
Tetra Pak Oy – beverage packaging  
Valio Oy – innovative dairy solutions  
Väriteollisuusyhdistys – Färgindustriföreningen r.y.  
Wienerberger Oy Ab – world’s largest producer of bricks and roof tiles

**Board of Directors**

Finnish Grocery Trade Association, Chair  
Fujitsu Finland  
Finnish Food and Drink Industries Federation  
RASI - communities of entrepreneurs in construction and decoration  
Stora Enso - renewable materials for packaging, biomaterials, and construction  
Finish Packaging Producers

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## 12. Greece

<b>Population</b>	10.8 mil.
<b>No. of local authorities</b>	240 municipalities in the system 82% inhabitants covered by system
<b>No. of companies in system</b>	1,720 membres
<b>Packaging introduced to the market</b>	400,000 tons
<b>Recovered waste</b>	379,896 tons packaging waste 28 sorting centers
<b>Types of packaging</b>	household, commercial and industrial
<i>(1) The population of 2012 is according to the 2011 census by the National Statistical Service of Greece</i>	

According to Greek Law No 2939 all enterprises producing or importing packaged products are obliged to collect and recycle the packaging of their products either by organizing an individual system for the alternative management of their packaging waste or by organizing and/or participating in a collective system. At the same time, local authorities are also legally obligated to see to the alternative management of their municipal packaging waste.

Moreover, according to the law, the national objectives are the following:

- 60% (by weight) recovery of the total of packaging waste out of which
- At least 55% (by weight) recycling

In addition, the following percentages of recycling per material are anticipated:

- 60% (by weight) glass
- 60% (by weight) paper and cardboard
- 50% (by weight) metals
- 22.5% (by weight) plastics
- 15% (by weight) wood

### Legal Basis

In August 2001, Law 2939/01 on “Packaging and the Alternative Management of Packaging and Other Products” was passed. The said law lays down the obligation for the alternative management of packaging in our country and harmonizes our national legislation with the related European Union legislation and in particular with European Directive 94/62/EC. At this point, we should note that in 2004 a new EU Directive was issued amending the goals set by Directive 94/62/EC. The new goals were incorporated into the national legal framework by means of the Joint Ministerial Decision 9268/469.

In particular, all enterprises operating in our country and producing or importing packaged products, which are in turn supplied to the domestic market, are now obliged to collect and recycle the packaging of their products. At the same time, apart from packaging operators, Local Authorities are also legally obligated and are therefore required to see to the alternative management of municipal packaging waste.

## Packaging organisation/s in Greece



The **Hellenic Recovery Recycling Corporation** (HERRCO S.A.) was founded in December 2001 by industrial and commercial enterprises which, either supply packaged products to the Greek market, or manufacture different packaging items. In addition, the Central Union of Municipalities in Greece (**KEDE**) has a shareholding of 35% in the System's capital. In compliance with the provisions of Law 2939/01 and in seeking to fulfill the obligations of packaging operators in an effective and cost-efficient way, HERRCO has developed and implemented the Collective Alternative Management System – "RECYCLING" (**C.A.M.S. – RECYCLING**) contributing significantly to the achievement of the national objectives. HERRCO's recycling system collects packaging waste from paper, plastic, glass, aluminium and tinplate. The collected stream is then transported to the Sorting Centers, where the recyclable materials are separated and forwarded for recycling.

### Operational Principles

HERRCO's operation is based on a set of fundamental principles ensuring the attainment of its goals and based on European practices. They are summarized in the following points:

- The contractual participation of packers and fillers is carried out subject to the same terms, regardless of whether they are shareholders or not.
- The possibility of acquiring a shareholding in the share capital is open to all operators, subject to the same terms with existing shareholders.
- The objective of HERRCO is not to achieve a positive financial outcome (not –for-profit company), but rather to utilize the financial resources allocated for the optimal recovery of packaging waste. It is for this reason that there is no provision for a dividend distribution to HERRCO's shareholders.
- The activities of the System which aim at the recovery of packaging waste from municipal waste are developed in close partnership with Local Authorities, as set out in the legal framework.

All packaging materials used by participating companies are treated in an equitable manner.

### Prevention

#### Municipalities

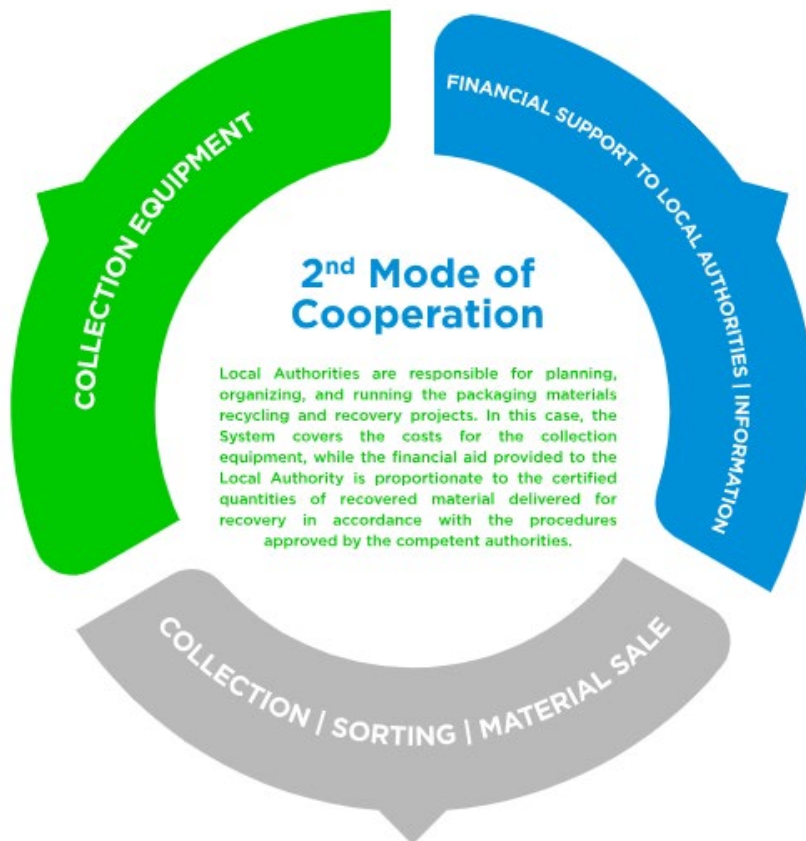
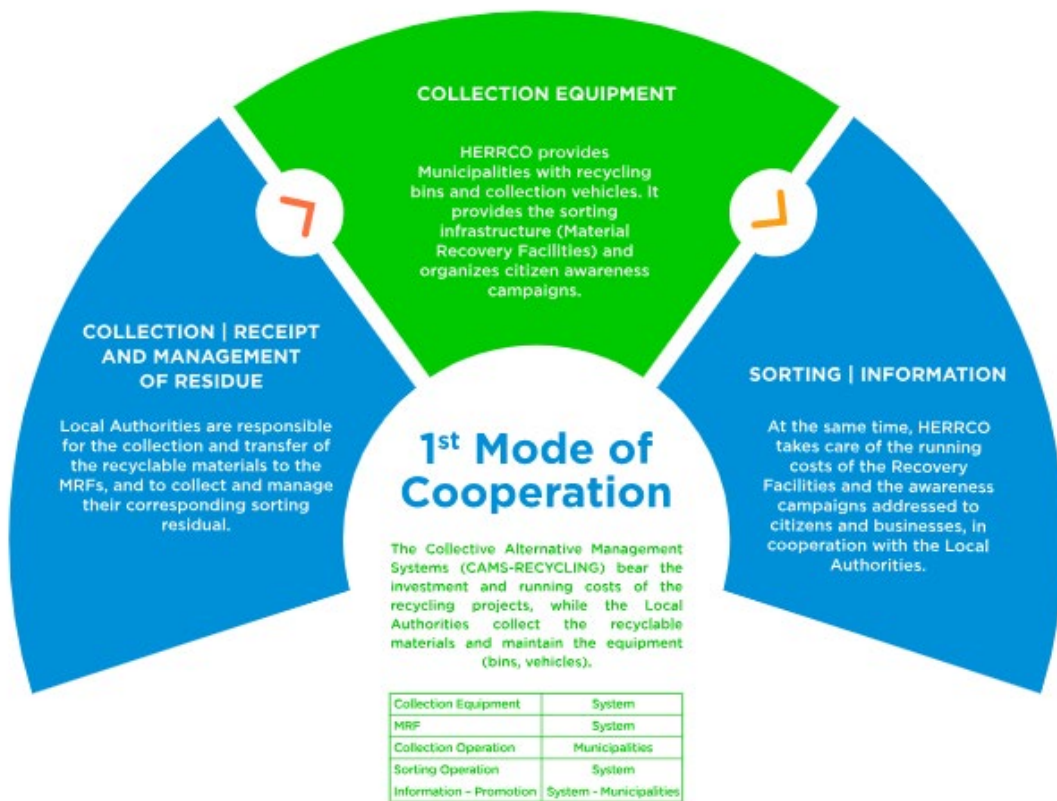
##### Methods of Cooperation with Local Authorities

Local Authorities (OTAs) – or other competent municipal bodies – and HERRCO sign collaboration agreements aimed at more efficient organization and management of packaging waste recycling, in accordance with Law 2939/01, as replaced by Law 4819/2021. The cooperation framework between OTAs and HERRCO includes two alternative modes:

#### Planning and Operation

The Blue Bin projects relate to the most important and difficult part of waste: municipal waste. They are addressed to the general public and are developed in cooperation with the Local Authorities, as provided for by the institutional framework. HERRCO continuously promotes the further development of the Blue Bins network





## Blue Bin Per Region

The System proposes the basic plan of the blue bin project to the cooperating OTAs.



The project planning is based on the population of the OTA to be included, according to the 2011 census (Hellenic Statistical Authority data). The equipment supplied to the OTAs shall include:

- Reusable recycling bags of a number equivalent to the number of the households of the OTA concerned.
- Adequate number of blue bins to fully meet the needs of the Municipality by applying the ratio of 1 bin per 75 residents.
- One (1) 15-16-ton collection vehicle (CV) for a network of at least 250 bins (corresponding to approximately 20 thousand residents) and one extra CV performing two trips to the MRF daily (or to the transshipment station) or operating 16 hours daily.

In some cases, planning is not based on the census data, as the population may either change seasonally (usually in holiday destinations) or have significantly changed since the census.

In such cases, the initial planning is based either on Solid Waste data or by estimating the equivalent population during the season that we have the maximum population (e.g., summer), as the bin network and the collection equipment should cover all seasons.

Where the population of an OTA is such that the provision of a collection vehicle is not justified, the OTA may choose either to cooperate with another neighbouring OTA and use a vehicle jointly or use its own collection vehicle and be financially supported by HERRCO for the use of its own collection vehicle based on the quantities collected from the blue bin network and transported to the MRF.

Once an agreement has been reached on the planning, the procedure for the donation of the collection vehicles succeeds. When the procedure is completed, the schedule shall be jointly prepared with the OTA, which shall include the start and completion dates of the information, the placement of the bins and the start of the collection routes.

## Glass Packaging Stream



With significant quantities of glass bottles accumulated in specific business areas, HERRCO has established a separate glass recycling stream since 2013. The Blue Bell bin is the key instrument for the separate collection of glass. Blue bells serve large producers and places of business activities such as nightclubs, bars, coffee shops, restaurants, hotel complexes etc. where large quantities of glass packaging are consumed which would otherwise end up in common waste. HERRCO provides the necessary collection equipment (reusable bags or wheeled bins) to the businesses while making regular and repeated visits to raise awareness and inform them of how to participate in the program. HERRCO is responsible for collecting and transporting the material in accordance with the procedures approved by the competent authorities. Finally, the material is forwarded to producers in Greece and abroad for recovery and recycling.

### **Pilot Separate PET Collection Projects**

The European Directive on disposable plastics sets out, inter alia, a different objective for the separate collection of plastic beverage bottles for 2025 and 2030. Following the European Directive 2019/904, in October 2020, Law 4736 was passed, which harmonized the European Directive and the operation of a guarantee system for plastic PET bottles was established starting in 2023.

As part of the above changes, in 2019 HERRCO started organizing pilot projects for separate collection of PET bottles. The following actions constitute a legacy for the upcoming operation of a guarantee system, as useful – operational and financial conclusions are drawn for the separate collection of this material.

### **Paper-Cardboard Stream**

In cooperation with Municipalities-Municipal Bodies and following their selection, separate paper-cardboard collection stream projects started and/or continued to operate:

### **Multi-Stream Projects**

In cooperation with Municipalities-Municipal Bodies and following their selection, more than two stream projects (blue bin – blue bell) operate.

### **Aluminium Stream**

#### **Event support with equipment, collection & quantity recording.**

HERRCO implements the collection and sorting of materials deriving from major events (e.g. in Herodion, in the Ancient Theatre of Epidauros), such as concerts, exhibitions (e.g. Oenorama) or sporting events (e.g. Classic Marathon) that take place in the said venues and delivers the necessary equipment, such as small 120lt wheeled bins or disposable bags. In particular, in cooperation with the Athens and Epidauros Festival, HERRCO has placed recycling bins at the entrance of the Odeon of Herodes Atticus and at the Ancient Theatre of Epidauros to recycle the quantities of plastics produced. Each year, it also supports the Athens Authentic Marathon where a large number of PET bottles are consumed. Special disposable bags are given to volunteers for the disposal of bottles, while collection bins are placed at the start, end, and at various locations along the route. Every year, about 35 events and concerts that take place at large and open venues such as squares, stadiums and football fields throughout Greece are served with special collection bins from HERRCO. But its action does not stop here. Historical buildings and important Institutions in Greece trust HERRCO, which supports their effort to recycle packaging materials and equips them with suitable bins. Examples are the historic building of the Hellenic Parliament, the Hellenic National Defence General Staff (HNDGS), buildings of the Ministry of Foreign Affairs and the Ministry of Finance and, of course, the building of the Ministry of Environment and Energy that are equipped with special equipment, recycling bins and regular collection routes on a weekly basis.

### **Innovation**

Besides the blue bin, the blue bell, and the special projects that HERRCO implements, as appropriate, in collaboration with Municipalities or Municipal Bodies, it has positioned 5 Reverse Vending Machines in well-

known supermarket chains under a pilot programme, where quantities are collected and recorded. The three materials, plastic, aluminium, and glass, are placed in a hole and land in 3 different bins following a visual separation. The machines were placed for the purpose of assessing the effectiveness of this method and exploring consumer interest, and in particular that of youth, so as to assess whether this collection infrastructure can be utilized for demonstration purposes and serve as an educational tool for the initiation in the packaging recycling practice.

### Legally Responsible Parties

With respect to the Recycling sector, 2003 was a landmark year for Greece, since **Law 2939/01**, as replaced by **Law 4819/2021**, obliged all the businesses that import, produce and place packaged products on their domestic market, to ensure the collection and recycling of their packaging. This legislation specifically refers to primary, secondary and tertiary packaging placed on the Greek market, as well as packaging waste from all sources (industry, commerce, offices, shops, services, households, etc.).

### How to be contracted

In order for a company to become a HERRCO member, it must sign a one-year Participation Contract.

The above **Participation Contract** must be signed by all those who place packaged products on the Greek market and these include:

- Importers and/or manufacturers thereof
- Brand owners/private label products

By signing the contract, each member fulfils its legal obligation and can use the European “Green Dot” trademark on the packaging it places on the Greek market.

### Contracted Businesses - Members

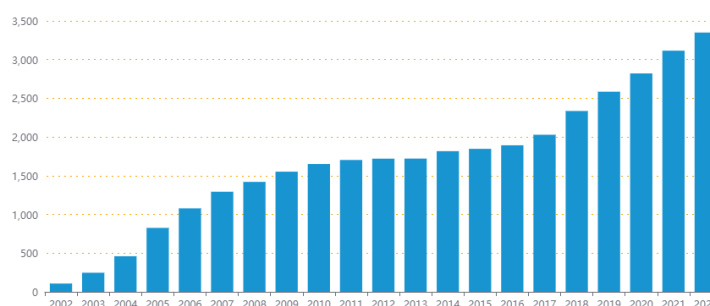
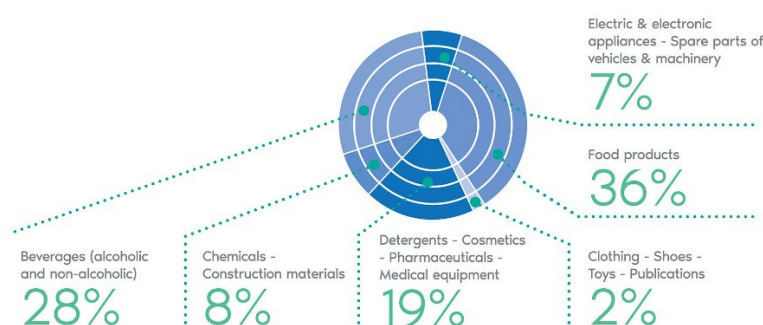


Figure 1 shows the evolution of signed contracts from the establishment of the System until the end of 2021. Up until 31 December 2021, 2821 businesses had signed a Cooperation Contract with the System. The relevant list of these businesses is communicated to the competent authorities. Click [here](#) to view the list of contracted businesses.



## Governance

The Board of Directors and its members shall be the supreme decision-making body on every matter concerning the Hellenic Recovery Recycling Corporation.

Chairman – Exec Chairman at Petros Pteropoulos (Automotive and Industrial Equipment)

Vice Chairman – Interior Designer and architect

Member – Municipal Head of Government

Member – Board member Hellenic Recycling Recovery Corporation

Member – Head of Intelligent Networks & Services, Institute of Communication and Computer Systems of National Technical University of Athens

Member – Municipal Mayor

Member – Law Firm Managing Partner, and former Deputy Finance Minister

Member – Municipal Counsellor and Board Member of Central Union of Municipalities

## Company Legal Framework

In August 2001, Law 2939/01 on “Packaging and Alternative Management of Packaging and Other Products” was passed, which essentially makes alternative packaging management mandatory in Greece and harmonizes our national legislation with the relevant European Union legislation and in particular with European Directive 94/62. In 2004, the new Community Directive (04/12) was issued revising the goals set by 94/62. The new goals were harmonized with the national legal framework by way of JMD No. 9268/469.

“All companies operating in our country and producing or importing packaged products, which are then placed on the domestic market, must collect and recycle their products’ packaging, i.e., must organize alternative management systems.

At the same time, Local Authorities (OTAs) are also legally obligated to ensure the recycling of the municipal packaging waste. The Law provides for the basic principles of cooperation between OTAs and the responsible packaging producers.

## Shareholder Structure

The Central Union of Greek Municipalities (KEDE) has a 35% stake in the System’s share capital and is represented in the 9-member Board of Directors of HERRCO with 3 members. Industry and trade undertakings that supplement HERRCO’s shareholder structure and participate through the Packaging Material Recovery (AYS) company are:

COCA-COLA 3E HELLAS SA  
COLGATE PALMOLIVE (HELLAS) SINGLE-MEMBER SA  
CHIPITA SA  
CROWN HELLAS CAN BIOMHX. ΕΙΔΩΝ ΣΥΣΚ. SA  
ION SA  
NESTLE HELLAS SINGLE-MEMBER SA  
PEPSICO HELLAS SA  
VIVARTIA HOLDING SA  
ATHENIAN BREWERY SA  
ELAIS-UNILEVER HELLAS SA

ELVALHALCOR SA  
MACEDONIAN MILK INDUSTRY-MEVGAL-SA  
PAPASTRATOS SA  
PROCTER & GAMBLE HELLAS SINGLE-MEMBER LTD  
TETRA PAK HELLAS SINGLE-MEMBER LTD  
BA GLASS GREECE SINGLE-MEMBER FAGE HELLAS  
DAIRY INDUSTRY SINGLE-MEMBER SA  
FRIESLANDCAMPINA HELLAS SA  
KLIAFAS SA

## **Basic Principles of Operation**

- Liable producers' open participation in the share capital under the same terms
  - Same contract for shareholders and non-shareholders
  - Ability to sign a contract with every interested producer
  - Does not aim at a profit, but the optimal use of the allocated resources – No dividend is distributed
  - Close cooperation with OTAs
  - Equal treatment of packaging materials
-

### 13. Hungary

<b>Population</b>	9.93 mil.
<b>No. of local authorities</b>	964 municipalities
<b>Packaging introduced to the market</b>	820,000 tons packaging nationwide 522,000 tons by contractual parties
<b>Recovered waste</b>	323,000 tons packaging waste
<b>Types of packaging</b>	

The producer responsibility scheme in Hungary was abolished in 2012 by accepting the new product charge law.

From 2012 ÖKO-Pannon has been working as a consultant company providing services in connection with environmental product charge and Green Dot trademark.

#### Main services:

- Optimization consultancy with relation to products liable to product charge (packaging, WEE – electric and electronic waste, battery, tyre, advertisement paper)
- Consultancy on individual exemption and coordination
- Preparing for compliance with the actual law on waste  
Preparing for compliance with the packaging regulation
- Supervision related to the fulfilment of recovery and recycling obligation and product charge reports
- Consultancy in the field of fulfilment of international recovery and recycling obligation (sending in contracts and reports)
- Providing the use of Green Dot trademark

#### Legal Basis

Before 2012, obligations related to packaging were included in two regulation systems not having tight relationship with each other.

On one hand the manufacturer (in case of packaging waste, the emitter of the packaged product) was responsible not only for planning the life of the packaged good but its packaging, too, thus it must provide for the collection and recycling of the produced waste. On the other hand, the emitter of the packaging was also obliged to pay a tax-like product charge. However, an exemption was given from the product charge if the obligor reaches an appropriate rate of recovery of the emitted packaging waste. The recovery rate increased year by year.

The new legislation on the product charge updated from 2012 ceased the system operated by the EPR schemes and took the management of recyclable waste into the hands of the state. The most significant amendment of the regulation was that the environmental obligations and recycling targets prescribed to the emitters of products affected by the product charge payment (packaging waste, electronic waste) cannot be achieved via a coordinating organisation. In some cases and under some special conditions, it is still possible to individually comply with the environmental obligations.

According to the legislation the state set up the National Waste Management Agency which took over the coordination of the recycling of waste produced by products affected by the product charge payment from 1st January 2012.

### Packaging organisation/s in Hungary



ÖKO-Pannon was founded at the end of 1996 the decisive companies of the environmental committee of CSAOSZ (Hungarian Association of Packaging and Material Handling), in order to realize the organized collection and recovery of packaging waste in Hungary, in compliance with the practices of the EU member countries.

Currently, 32 large, significant packaging, filling, packaged good importer and packaging manufacturer companies belong to the founders of ÖKO-Pannon.

From 2003 till 2011 ÖKO-Pannon was operated to help its partners fulfil their obligations stipulated by national law and to support sustainable development. Within its core activities, ÖKO-Pannon co-ordinated the waste management circle from the output of packers and fillers, through the collection and recycling activities. In a close co-operation with municipalities, ÖKO-Pannon was contracted to all parties in the waste management circle.

### System Description

#### Green Dot

The legal usage of the trademark:



#### What is Green Dot?

The Green Dot ('Der Grüne Punkt') is a trademark being under international protection, that is used in commerce on the packaging of products and goods. The Trademark is used to indicate that the company which is entitled to use it – producer or distributor of the packaged products – complies with legal rules regarding packaging, European Parliament and Council Directive 94/62/EC on packaging and packaging waste, substantive requirements regarding packaging fixed in it and EU standards about environmental protection and packaging.

By right of the license of the trademark owner PRO EUROPE s.p.r.l. international organization and the registration by the Hungarian Intellectual Property Office (registration numbers: 653450, 653449, 585714, and 585713) ÖKO-Pannon Nonprofit Plc. is exclusively entitled to the usage of the Green Dot Trademark in Hungary.

### Sub-licenses

On the basis of the above information, the producers and importers of Green Dot marked products have permission to use the trademark on the packaging of their products only by the further authority (sub-licence) of ÖKO-Pannon Nonprofit Plc., the exclusively entitled organization, at a charge of trademark fee. The proviso of the authorization of usage of the Green Dot trademark means the right of sub-licence is to enter into a trademark-using contract.

The concerned companies that use or wish to use the Green Dot trademark on the packaging of their products are obliged to make a trademark using a contract with ÖKO-Pannon Nonprofit Plc. for legal usage.

ÖKO-Pannon Nonprofit Plc. is convinced that the **Extended Producer Responsibility (EPR) principle** is the optimal solution for fulfilling environmental targets in combination with economic needs and being active as well in widening self-compliance.

- *Since the adaption of the EU Circular Economy Package in 2018 increased recycling quotas are adopted and high attention is paid to the extended producer responsibility principles (EPR).*
- *In case the Hungarian government follows best European Practices and the obligation is transferred to fillers/packers, ÖKO-Pannon Nonprofit Plc. is. ÖKO-Pannon Nonprofit Plc as a former well-functioning EPR organization has the necessary know-how to help the industry reach recycling targets.*
- *In the last years, ÖKO-Pannon Nonprofit Plc. in alliance with professional organizations and leading packaging manufacturers proposed changes in the legislation and developed recommendations in line with the new requirements.*
- *ÖKO-Pannon Nonprofit Plc. maintained in the last years the professional knowledge in the field of packaging collection and recycling.*

### Prevention

Due to the new legislation of environmental product charge put into force in January 2012, ÖKO-Pannon Nonprofit Plc. has launched a consultancy service on compliance with actual environmental product charge and waste law for packaging emitters.

According to the legislation in Hungary, all companies are obliged to pay an environmental tax (official name: environmental product charge) to the National Tax and Customs Administration (NTCA; abbreviated Hungarian name: NAV).

The object of the charge is the packaging material instead of the packaging and therefore packers are directly not subject to the law for domestic products.

In the case of products produced abroad the importer company is responsible for the charge, i.e. the company that imports, and sells the product in Hungary for the first time (with the first HU-VAT Nr. invoice) or uses it for their own purposes.

### Governance

N/A

## 14. ICELAND

Iceland's authorities have set the goal of systematically reducing waste formation and channelling waste into reuse and recovery. The Act on Recycling Fees was passed in an effort to achieve this end, charging the Icelandic Recycling Fund with creating conducive economic conditions for reuse and recovery, lowering the volume of waste going into final disposal and ensuring the proper disposal of hazardous substances.

### Legal basis

Icelandic legislation covering waste management is in accordance with EU legislation. Iceland has transposed into national law the acquis on waste covered by the EEA (European Economic Area) Agreement.

The Act on Recycling Fees was passed in order to create conducive economic conditions for reuse and recovery, lowering the volume of waste going into final disposal and ensuring the proper disposal of hazardous substances. A recycling fee is collected on each product before it goes on the market after its manufacture or importation. The fee is to cover the recovery cost on any waste remaining when the object's service life is over.

### Packaging organisation/s in Iceland



*The purpose of operating the Icelandic Recycling Fund and collecting recycling fees.*

In recent years, understanding has increased of how necessary it is to gain control of the growing quantity of waste that has accompanied today's consumer society.

Demands are placed by individuals, municipalities and the commercial sector on systematic solutions for waste and on products not causing damage to the environment. At the level of the European Economic Area, rules with this objective have been set for the Area as a whole, as well as by the governments of individual member states.

These rules build on the "polluter pays principle", meaning that whoever causes waste should pay for its reuse, recovery or disposal. The trend is towards shifting responsibility to an ever greater extent onto those who put the product on the market, regardless of whether they are manufacturers or importers. This is referred to as "producer liability".

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### System Description

#### Icelandic Recycling Fund

The Recycling Fund is a state-owned agency, responsible to the Minister for the Environment. In order to ensure the best possible outcome of agency activities, its Board is composed of the representatives of those who have the greatest interest in waste handling being as efficient as possible, i.e. representatives of municipalities and the commercial sector.

The five directors on the Recycling Fund Board are appointed by the Minister for the Environment for four-year terms. The Minister appoints the Board Chairman without a nomination, along with one director upon a mutual nomination by the Federation of Icelandic Fish Processing Plants and the Federation of Icelandic Fishing Vessel Owners, one director from the Federation of Icelandic Industries, one director from the Federation of Trade and Services and one director from the National Association of Local Authorities in Iceland.

The Fund applies economic incentives to establish practical arrangements for processing waste, which means providing the monetary prerequisites so that businesses in the market will realize the benefit of involving themselves in the processing programme. It is for this reason that the Fund contracts out waste processing, based on tenders or task contracts, and uses the recycling fee to pay the expenses.

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## 15. Israel

<b>Population</b>	7.7 mil.
<b>No. of local authorities</b>	40 municipalities in the system 1.5 mil. inhabitants covered by system
<b>No. of companies in system</b>	500 members
<b>Packaging introduced to the market</b>	300,000 tons representing about 45% of all packaging materials brought onto the Israeli market
<b>Recovered waste</b>	190,000 tons of packaging were recycled
<b>Types of packaging</b>	Household and Industrial packaging

### Legal basis

The Israel's Packaging Law 2011 imposes direct responsibility on manufacturers and importers which place in the Israeli market packaged products with more than 1 ton of packaging each year, to recycle its packaging waste, according to annual targets set out in the Law:

- General targets – 2012: 40%; 2013: 50%; 2014: 55%; and 2015: 60%
- Specific targets for each type of the following materials: Plastic, Paper Cardboard, Glass, Metal, and Wood.

In addition, the manufacturers and importers are obliged to fully fund the separation, collection, sorting and recycling systems implemented by the local authorities in Israel.

The fulfillment of the above obligations has to be done through a company which is authorized by the Ministry of Environment as a Packaging Recovery Organization.

### Packaging organisation/s in Israel



TAMIR., a not-for-profit organization, was established in 2011 by the major Israeli manufacturers and importers for the purpose of becoming a Recognized Packaging Recovery Organization under the Israeli Packaging Law, enabling manufacturers and importers of pre-packed products and service packages to fulfill their legal obligations under the Packaging Law.

TAMIR was granted with the authorization to operate as a Packaging Recovery Organization, on December 1, 2011, and started its operation on January 1, 2012.

Currently TAMIR is the only Packaging Recovery Organization operates in Israel.

## System Description

In order to fulfil its obligations, which include funding the separation and collection of packaging waste, as well as compliance with recycling targets set forth by the Packaging Law, the manufacturers and importers are required to contract with TAMIR to pay handling fees determined by the weight of the material and the type of packages (Household or Industrial) they place in the market.

TAMIR is in the process to sign various agreements with the entire Israeli local authorities in order to fund all its activities related to the separation, collection, and removal of packaging waste.

The arrangements for the separation and collection of packaging waste, as implemented by the local authorities and financed by TAMIR, provide a solution to packaging waste formed in private homes by the consumers and enable the establishment of a broader infrastructure for the collection of household packaging waste on a national level.

## Prevention

The Packaging Law has set general and specific recycling targets (by types of materials), which gradually increase over the years, until reaching their maximum levels in 2015.

The recycling targets set by the packaging law are as follows:

Year	General	Glass, Paper & Cardboard	Metal	Plastic	Wood
2011	30%	30%	15%	15%	15%
2012	40%	40%	30%	22.5%	15%
2013	50%	50%	40%	22.5%	15%
2014	55%	55%	40%	22.5%	15%
2015 onwards	60%	60%<			

## Governance

T.M.I.R. Manufacturer/Importer Recycling Corporation in Israel Ltd. - (T.M.I.R.) ("Tamir") was founded by the Association of Manufacturers in Israel, is a company that was established to allow a manufacturer/importer of packaged products and service packages to maintain all their obligations according to [the law regulating the handling of packaging, 2011](#) (the "Packaging Law").

**Tamir** is a non-profit public benefit company.

Tamir was recognized by the Ministry of Environmental Protection as a "recognized body" on December 1, 2011. On December 1, 2021, [the recognition of Tamir was renewed](#) for a period of five more years.

To read the conditions of recognition as published by the Ministry of Environmental Protection,

## Shareholders

- The Central Company for the Production of Soft Drinks Ltd
- Gan Shmuel Food Ltd
- Assem Investments Ltd – Nestle
- Tempo Beverages Ltd – Pepsico
- Kimberly Clark Israel Ltd
- Zenalkal Ltd
- A. Angel Bakeries Ltd
- Ypaora Tabori Ltd
- Unilever Israel
- Strauss Group Ltd
- Shufersel Ltd
- Snow – Brunos Industries Ltd
- Tnuva Food Industries – agricultural co-op society

## Board

All in hebrew!

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## 16. Italy

<b>Population</b>	60,483,973
<b>No. of local authorities</b>	8000
<b>No. of companies in system</b>	830000
<b>Packaging introduced to the market</b>	13 065 000
<b>Recovered waste</b>	10 196 000 tons (78%) 67,5% Recycled
<b>Types of packaging</b>	all packaging (primary, secondary and tertiary)

Decrees:

Legislative Decree of 5 February 1997, n. 22: Waste Management

Legislative Decree of 3 April 2006, n. 152 : Environmental law

Chief Targets:

	2002		2008	
	min	max	min	max
RECOVERY	45%	65%	60%	
RECYCLING	25%	45%	55%	80%
RECYCLING PER MATERIAL				
Aluminium	15%		50%	
Glass	15%		60%	
Paper	15%		60%	
Plastic	15%		26%	
Steel	15%		50%	
Wood	15%		35%	

## Packaging organisation/s in Italy



CONAI is a private system, created and designed by companies: with 830000 members, between packaging producers and users, CONAI is one of the largest consortium in Europe. Its task is to manage the recycling and the recovery of packaging in all of Italy and to pursue the recycling and recovery objectives set by European legislation, first acknowledged in Italy by the Ronchi Decree (legislative Decree 22/97), which was replaced by the legislative Decree “Environment Regulations” in 2006 (legislative Decree 152/06).

The CONAI management was entrusted by law, on the basis of a unique model through which private effectively manage a matter of public interest: the protection of the environment.

CONAI safeguards the environment by embracing the entire packaging lifecycle, from production to end-of-life management. To this purpose CONAI promotes the adoption of environment-friendly packaging at source, and then co-ordinates the recovery and recycling of packaging after use.

### Organisation

The CONAI model is based on the principle of “shared responsibility” which assumes the cooperation of all participants involved in waste management: from companies, which produce / make and use packaging materials, to the Public Administration, which make the regulations for waste management,

*The CONAI System is based on the activities of six consortia that represent materials that are used in the production of packaging: steel (CONSORZIO RICREA), aluminium (CIAL), paper (COMIECO), wood (RILEGNO), plastic (COREPLA) and glass (COREVE). Each consortium must, for each material, coordinate, organize and increase: the take back of packaging waste (mainly from separated waste collection), the recycling and recovery processes.*

The ongoing environmental contribution made by the members provide the resources for CONAI’S activities.

### System Description

#### The consortium system in Italy and Europe

Legislative Decree No 22/97, or the Ronchi Decree, assigned the consortium system the task of achieving the overall target of recycling and recovery packaging across the whole of Italy and, at the same time, ensuring that targeted management policies are implemented, including prevention policies, through eco-innovation. The CONAI System guarantees compliance with the principle of extended producer responsibility, allocating the CONAI Environmental Contribution (CAC) among producers and users.

By joining CONAI, the producer/user is obliged to pay the CAC, which varies depending on the type of packaging put onto the market. CONAI retains a minimum amount to carry out its work, while a considerable part is given to the Material Consortia which, in turn, pay compensation to the agreement Municipalities, in accordance with the provisions of the ANCI-CONAI Framework Agreement, to cover the additional charges resulting from the separate collection of packaging.

On an international level, CONAI is a member of EXPRA, the Extended Producer Responsibility Alliance, which serves as the European reference organisation representing non-profit systems for managing packaging and packaging waste.

According to the final data published in the last General Programme for the Prevention and Management of Packaging and Packaging Waste, in 2021 Italy sent 73.3% of the packaging placed on the market for recycling: 10 million 550 thousand tonnes. This percentage is slightly up compared to the record of 2020, when a level of

close to 73% was reached, and a result that far exceeds the 65% total recycling required by Europe from its member states by 2025.

All this despite a year of strong recovery in consumption, which saw an exponential increase in the amount of packaging released for consumption: over 14 million tonnes, about 8.5% more than the previous year. The 10,550,000 tonnes of packaging sent for recycling is a result achieved 50% thanks to the work of the supply chain consortia of the CONAI system, 48% thanks to independent recyclers and the remaining 2% thanks to the work of independent systems.

If we add to the recycling figures those of energy recovery, which uses packaging waste as an alternative fuel to produce energy, the numbers grow: in 2021 Italy will exceed 82% of recovered packaging, i.e. more than 11.8 million tonnes. The national data could not be so positive if it were not for the work carried out by CONAI with Italian municipalities through the national agreement with ANCI, which allows the interception of flows from urban collection, as well as with a network of 579 regeneration, repair and recycling platforms that deal with commercial and industrial packaging, in agreement with the supply chain consortia.

In 2021, 7,583 municipalities signed at least one agreement with the consortium system, with 98% of the population served.

To cover the higher costs that municipalities incur in collecting waste separately in 2021, the CONAI system paid the country's local administrations almost EUR 727 million, about EUR 70 million more than the previous year.

445 million, on the other hand, were allocated by the system to finance treatment, recycling and recovery activities.

## Prevention

Prevention is a set of policies, programs and best practices, taken before a substance, material or product has become waste. In reference to packaging solutions, one of the most important challenge is to minimize environmental impacts with a life cycle approach. All the activities carried out by CONAI, in accordance with current legislation, aim to promote specific measures of prevention, first of all for members. Moreover, every year, CONAI draw up a "Programma generale di prevenzione" sent to the Italian Authorities by the end of June. In this document CONAI describes measures and results of prevention activities and recycling, defining a 5-year implementing program.

CONAI promotes prevention through two different kind of measures:

- Structural initiatives: economic incentives and fees modulation in order to consider reuse and recyclability of different packaging solutions;
- Awareness initiatives: like "Pensare Futuro" project to promote and support business strategies with the aim to improve sustainable packaging solution, starting from eco design.

The CONAI's purpose aims to raise awareness on prevention topic for all the supply chain, from producer to consumer, to realize the transaction toward both circular economy criteria and sustainable development goals.

## Governance

### Organization, Management and Control Model

In compliance with the legislation on the administrative responsibility of legal entities referred to in **Legislative Decree 231/2001** and consistently with its ethical-social principles of correctness and transparency in the conduct of institutional activities, the CONAI Board of Directors has adopted an **Organisation, Management and Control Model** and a **Code of Ethics** .

The adoption by CONAI of an Organization, Management and Control Model of its activity is aimed at preventing the occurrence of crimes and avoiding the onset of its own administrative responsibility for the same, through the preparation and adoption of rules of specific behaviors.

The CONAI Model is made up of a "General Part" and a "Special Part" divided based on the categories of crimes deemed relevant within the scope of CONAI's activity. In particular:

- the General Part describes the relevant legislation and the general operating rules of the Model and the Supervisory Body;
- the Special Part, divided into chapters prepared by category of Crime contemplated in Legislative Decree 231/2001 and focused on the areas of activity and processes considered potentially sensitive, provides an indication of the general principles of behavior to be followed for the prevention of Crimes Prerequisite.

## Board

The CONAI Statute and Regulations define the consortium bodies and positions which are: the **Assembly of consortium members**, the **Board of Directors**, the **President**, the **Vice Presidents**, the **Board of Auditors** .

- the **Assembly of consortium members** : it is governed by the articles. from 17 to 21 of the **Statute** . [The specific CONAI Assembly Regulations](#) have been approved for its operation .
- The Board of Directors is made up of 19 members.  
Nine administrators belong to the Producers category, nine to the Users category while the nineteenth administrator is indicated by the Minister of the Environment and Energy Security and the Minister of Business and Made in Italy representing consumers.  
The Board of Directors holds office for three years and elects the **President of the Consortium from among its members**, who has the task of ensuring that it operates in accordance with the interests of the Consortium itself.
- The President of the Consortium for the three-year period 2023-2025 is **CEO of the Burgo (Paper) Group**
- The Vice Presidents of the Consortium are representing the commercial users and distributors component, and the various users.
- The Board of Auditors verifies the regularity of the accounting management of the consortium, expressing itself collegially with specific reports to the Assembly on the budget estimate and the final balance sheet. It is made up of seven full members and two alternates. Three of the full members are appointed respectively by the Ministry of the Environment and Energy Security, the Ministry of Business and Made in Italy and the Ministry of Economy and Finance.

The Statute provides for the appointment of a **General Director**, who collaborates with the President in the execution of the resolutions of the Consortium Bodies and participates in the meetings of the Assembly and the Board of Directors but without the right to vote.

## Supervisory and Control Body

The Board of Directors has also entrusted a collegial Supervisory and Control Body, made up of three individuals, one of which has the role of coordinator, with the task of supervising the functioning and observance of the Model and of ensuring its updating. .

The Supervisory and Control Body has autonomous powers and is included in the CONAI organization chart as a staff unit, in the highest hierarchical position, "reporting" to the Board of Directors. The Supervisory and Control Body remains in office for three financial years, expiring on the date of the Assembly called for the approval of the budget relating to the last financial year of said office, similarly to what happens for the Board of Directors and the Board of Mayors.

## 17. Luxembourg

The Grand-Ducal Regulation of October 31, 1998 which came into force on January 1, 1999 has as goal to prevent, reduce, reuse and recycle packaging.

The people responsible for packaging are obliged to take back and recycle their packaging. However, they can transfer their responsibility to an officially approved company like VALORLUX.

The tasks of Valorlux are the promotion, coordination and financial support of the separate collection, the sorting and the recycling of household packaging waste in the Grand Duchy of Luxemburg.

<b>Population</b>	524,853
<b>No. of local authorities</b>	106 municipalities 105 municipalities with VALORLUX blue bag collections 116 municipalities benefit from financial support
<b>No. of companies in system</b>	1,076 membres
<b>Packaging introduced to the market</b>	53,175 tons of declared household packaging 10,281 tons of declared commercial packaging
<b>Recovered waste</b>	46,739 tons packaging waste 73.48% overall recovery 72.08% recycled
<b>Types of packaging</b>	Household and commercial

### Legal basis

Legislation on packaging waste is increasingly strict and binding be it at a European or at a national level.

The amended grand-ducal Regulation of October 31st 1998 transposes into national law the European Directive 94/62/EC on Packaging and Packaging Waste as well as its March 2005 revision.

The regulation established several obligations the Party Responsible for Packaging has to abide by:

collection of packaging for recycling and/or recovery purpose in order to reach the recycling and recovery rates defined by the amended Grand-Duchy Regulation;

Information of the consumers about the measures taken to reduce packaging waste and what has become of the collected packaging. Yearly report to the Administration in charge of the environment;

Prevention actions in relation with packaging

The legal recycling/recovering rates are:

<b>Glass</b>	<b>60%</b>
<b>Paper/cardboard</b>	<b>60%</b>
<b>Metal</b>	<b>50%</b>
<b>Plastics</b>	<b>22,5%</b>

<b>Wood</b>	<b>15%</b>
<b>Total recovery</b>	<b>65%</b>

The Party Responsible for Packaging may fulfill his obligation personally or ask a registered body to do it for him: VALORLUX a.s.b.l. for instance.

In the name of its members, VALORLUX aims at reaching the recycling and recovery rates and the information and prevention targets imposed by the legislator.

In 2012, VALORLUX collected 90.56kg of packaging per inhabitant including 14.17 of PMC (Plastic bottles and containers, metal packaging, beverage cartons collected by blue bags), 59.69 kg was collected by the municipalities and 16.70 kg was commercial packaging.

### Packaging organisation/s in Luxembourg



Valorlux is a voluntary initiative of the private sector, a non-profit association, founded on October 2, 1995 by 24 associated members and by 6 supporting members.

The associated members represent the producers and importers of packaged goods, retailers, producers of packaging materials and professional associations.

VALORLUX provides an overall sustainable and cost-effective solution to the management of household packaging waste flows with a view to providing for a better environment.

The collection of Plastic bottles and containers, Metal packaging and Beverage Cartons by means of the blue bag is entirely organized and taken in charge by VALORLUX. The bags are collected from door to door every two weeks in municipalities linked to VALORLUX by contract. Packages are then passed on to the sorting plant where they are sorted by material and forwarded towards different recycling plants.

Each citizen, organization or company can participate to the collection of PMC through the blue bag on condition that they reside in a municipality that takes part in the collection system.

VALORLUX gets its income from the Green Dot contributions paid by all participating members depending on the volume, weight and composition of the packaging they place on the market and on the complexity of the recycling process related to the packaging in question. The sale of collected materials represents another source of income, but nevertheless remains marginal.

### System Description

VALORLUX coordinates the selective collection of household packaging waste via the blue bag. The bags are collected from door to door every two weeks in all the municipalities in Luxembourg. Each citizen, organization or company can participate to the collection. VALORLUX is funded by the Green Dot contributions paid by all participating members depending on the volume, weight, and composition of the packaging they place on the market.

### Prevention

In 2004, in close collaboration with the Ministry of Sustainable Development and Infrastructures, the Environment Agency, the Luxembourg Confederation of Commerce (clc) and retail chains, Valorlux launched the “Eco bag” project in order to avoid the use of single-use bags and save natural resources through the use of this reusable shopping bag. In 2012, the European Commission designated the “Eco Bag” project as an example of good practice in the field of waste prevention. Nowadays, the Ecobag is available in more than 60 partner stores.

In 2019, the range has been extended by a reusable fruit and vegetable bag, the SUPERBAG®

## Governance

Valorlux is a non-profit organisation (ASBL) founded in 1995 and authorised by the Luxembourg Ministry of the Environment, Climate and Biodiversity.

- We handle the extended producer responsibility on behalf of our members.
- We manage the end-of-life of single-use packaging and objects efficiently and effectively, and in doing so we aim to use resources responsibly.
- We demonstrate a strong commitment to sustainability by facilitating the systematic prevention, reuse and recycling of all packaging on a large scale, fueling an essential economic value chain.
- We adopt an advanced digital approach to efficiently collect, manage and process data related to our business. This enables us to generate accurate and relevant reports for the authorities and ourselves, strengthening our ability to make the necessary decisions and enhancing our performance.
- We consult and educate our stakeholders on our core activities and, through our experience and proactive initiatives, are recognised as the thought leader in these areas.

## Packaging Waste Collection

To achieve the recovery and recycling quotas imposed by law, Valorlux supports and organises several collection systems:

- Door-to-door collection using the blue bag
- The RE-Box
- Financial support for organisations providing their own selective sorting and collection system
- Centralized management through resource centres

## The principle of co-responsibility

From the producer to the consumer, each operator involved in the life cycle of a package has the responsibility for his recycling.

- Industry : as the “Responsible for packaging”, producers, importers or marketers must ensure compliance with the legal obligations in force relative to waste recycling and recovery of packaging waste put on the market, as well as the obligation on Information requirements and the support of consumers’ awareness. Upon acceding to an eco-organization like Valorlux, the responsible of packaging provides a financial contribution to a shared-cost system, which organizes and ensures a part of the fulfillment of the legal requirements.
- Consumers : Through good practices of waste sorting, the consumer also enhances the quality of recycling, once the waste is collected. The consumer is a major key holder in the recycling process.
- Public authorities : In Luxemburg, the environmental administration ensures the monitoring and comply with laws relative to packaging waste. Municipalities co-operate in the realization of waste sorting systems and selective waste collection in their territory.
- Recycling facilities : they ensure the take-back and recycling of collected packaging waste, as a function of their precise remit, which is imposed on them.

## Members

The companies responsible for placing packaged products on the market must individually fulfil legal obligations relating to packaging or may transfer their legal obligations to an approved body such as Valorlux asbl. Valorlux now has more than 1,000 member companies.

## 18. Macedonia

<b>Population</b>	2.1 mil.
<b>No. of local authorities</b>	85 municipalities 65% inhabitants covered by system
<b>No. of companies in system</b>	659 membres
<b>Packaging introduced to the market</b>	110,000 tons (total estimated packaging waste) 40,200 tons (reported packaging waste to Pakomak)
<b>Recovered waste</b>	Recycled 7,600 tons packaging waste
<b>Types of packaging</b>	Household and commercial

### Legal basis

Directive EC/94/62 about packaging and packaging waste

Directive EC 2004/12 about packaging and packaging waste

Law on Packaging and Packaging Waste Management, 2009

### Packaging organisation/s in Macedonia



Pakomak is a nonprofit company, founded on 3/12/2010, whose main activity is management of packaging waste. According to the Law on Packaging and Packaging Waste, since January 10, 2011 Pakomak is the first company in Macedonia, licensed by the Ministry of environment for selection and processing of packaging waste.

Eleven leading manufacturing companies in Macedonia are founders of the company: Pivara Skopje AD Skopje (Coca-Cola & Heineken), Prilepska Pivarnica AD Prilep (Pepsi) ; Vitaminka AD Prilep; Pelisterka DOO Skopje; Magroni DOO (Ladna, Dobra Voda); Koding Dooel Kavadarci (Gorska Voda) Kozhufchanka DOO Kavadarci (Sinalco) ; Vivaks Dooel Skopje; Blagoj Gjorev AD Veles; Vinery Tikvesh AD.; Vinery Stobi AD.

Company's goal is to build long-lasting and solid cooperation with its customers and the Government and in accordance with European regulations – to minimize the negative impact of packaging waste on the environment, to promote a responsible attitude towards the companies packaging waste, thus allowing better quality of life to all.

### System Description

Pakomak provides collection and recovery of packaging waste through municipal schemes of separate collection, but also through private waste management companies. This solution is based on legal framework given by the Macedonian packaging and waste law.

It obliges producers, importers, fillers, and distributors of packaging and packaged products to provide collection and recovery of packaging waste. They co-finance costs of municipal separate collection of waste through the Pakomak system and network of partners. Based on the same Law, the municipalities are obliged

to separate and recover waste. Part of sorted components of municipal waste is also consumer packaging, which should be recovered.

Pakomak is obliged to offer the same terms of service to any client-company and waste operator interested to participate in compliance scheme and same time to offer the same terms of support to any municipality interested to participate in packaging collection and recovery system.

Pakomak network and system cooperates with 15 municipalities and their communal waste companies, but also cooperate with more than 10 private waste management companies.

The decision of Macedonia to harmonize its legislation with EU regulations (European regulation 94/62/EC on packaging and packaging waste) has brought certain obligations for companies in Macedonia that market/sell products packed in any packaging form.

Besides the 11 founding members of the company, Pakomak cooperates with more than 300 other companies, and is still open for new members. Pakomak provides environmentally safe and economically viable solutions to packaging waste to all of them.

Manufacturers and importers of products packed in any type of package, now have a legal obligation to organize a system for the collection, selection and recycling of their packaging waste, which at the end, is given to the final users. With this principle of “extended producer responsibility”, all entities in the chain and the final users (manufacturers, packers, importers, and distributors) will have a possibility to reuse or use the packaging material that has been placed on the market.

The mission of Pakomak is to ensure responsible, efficient and most economically affordable management of the customer’s packaging waste in accordance with their legal obligations.

According to the Laws, Macedonian companies have obligation to submit *Monthly Reports* for packaging waste generated, prepared on the basis of *Product Specifications* and a Sales Report for that month.

1. Product specifications
  - Information on the amount of generated packaging waste per product/item.
2. Monthly reports
  - Information on the total amount of released/generated packaging waste on the Macedonian market for all products. The report (for the previous month) is submitted no later than the 15th day of the month

In addition, in case of an audit by the Ministry of Environment and Physical Planning, companies are responsible for the accuracy of the data sent to Pakomak.

According to the Laws, since 1.1. 2012 all manufacturers and importers have to have a symbol on the packaging for the type of packaging – paper, glass, plastic, metal, wood or composite material.

For easier identification and classification of packaging.

Apart from the symbol for the type of packaging, manufacturers and importers will be required to have a symbol of belonging to a system for waste management. Members of the Pakomak system get the Green Dot symbol.

## Prevention

Pakomak's operation is based on the following 5 principles:

1. Establishment of a system of waste packaging management that will create the greatest environmental benefits with minimal economic resources and efforts.
2. Calculations of fees to customers with no profit for the founders (there will be no payment of dividends)
3. Transparent operation with continuous review
4. Equal treatment of all customers
5. Building partnerships with government ministries and municipalities to achieve national targets for dealing with packaging waste

## Governance

Chairman of Board	Prilepska pivarnica AD, (Brewing) Director of the general and legal
Members of Board	Blagoj Gjorev AD, (Food Industry) General Director Magroni DOO, (Dobra Voda Water), Marketing Director VV Tikvesh AD, (Wine) Finance Director Pivara Skopje AD, (Coca-Cola and Heineken) Public Relations Mgr Pelisterka AD, (Beverage Manufacturing) Commercial Director Vitaminka AD, (Food Manufacturing) Head of Legal Service Kozuvchanka DOO, (Beverages) Head of Legal Service Vivax AD, (Household Supplies) Commercial Director Stobi Winery, (Wine) Procurement Director Coding LLC, (Information) Director

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## 19. Malta

### Legal Basis

Maltese Legal Notice 277 of 2006 states that organizations whose activities lead to the generation of packaging waste within the Maltese market have a legal obligation to recover this packaging. They voluntarily join the scheme by submitting a declaration of packaging put on the Maltese market, whether through local production or imports.

<b>Population</b>	416,110
<b>No. of local authorities</b>	34 Local Councils out of a total of 68 50.82% inhabitants covered by system
<b>No. of companies in system</b>	1265 membres
<b>Packaging introduced to the market</b>	17,415.79 tons
<b>Recovered waste</b>	10,540.45 collected by scheme 58.39% recycled 60.52% recovered
<b>Types of packaging</b>	Household and commercial

### Packaging organisation/s in Malta



GreenPak, first established in 2004, operates a compliance scheme to recover packaging waste in Malta and Gozo, on behalf of importers/producers. Its main aim is to tackle the steadily increasing waste problem across Europe, and to provide Maltese organisations with the facility to conform to their packaging recovery obligations with minimal effort and at the least possible cost.

### System Description

As the pioneer in its field the GreenPak Compliance Scheme is the longest running registered compliance scheme in Malta fully authorised by the environment regulator, the Malta Environment and Planning Authority. From its humble beginnings in 2004 with 100 members, GreenPak now has a membership base of over 1300 members. During 2010 GreenPak invited its members to actively take part in the scheme and evolved from a private limited company to a Cooperative run by a Board consisting of its own members. The members of the Board represent all the sections of the Scheme's membership base i.e. from the largest organization to the smallest. During 2011 GreenPak was awarded the "Management Award for Sustainable Development" by the Cleaner Technology Centre.

### Prevention

A network of 800 smart iBiNs have been installed around Malta & Gozo. These revolutionary iBiNs are equipped with smart technology that enables citizens to recycle 24/7 and spells an end to overflowing bring-in sites.

Using next-generation Internet of Things technology introduced for the first time to the island by Vodafone Malta, the iBiNs have the capability to monitor waste levels and feed information back to a central system which enables GreenPak's recycling service to prioritise and customise collection routes in the localities it serves across Malta and Gozo.

The smart iBiNs are being supported through the Business Enhance ERDF Grant Schemes Initiative, and part-financed by the European Regional Development Fund under Operational Programme I 2014-2020 'Fostering a competitive and sustainable economy to meet our challenges'.

Apart from eradicating unsightly overflowing, the bins will enable GreenPak to avoid unnecessary truck movements and focus only on those bins which actually need to be emptied, improving the quality of air and improving traffic on our roads.

The iBiNs are managed in real time and data received is fed into the fleet management system, informing drivers which ones require urgent attention or not. Apart from helping GreenPak improve its service, thanks to this, GreenPak will also be minimising the carbon footprint and reducing costs.

GreenPak has also developed a web-app and has teamed up with Vodafone Malta to provide this technology to the public. Through their phones or tablets, the public is informed of the bins closest to them so that they can determine if these have spare capacity to take more recyclable material.

On selecting the colour-coded image of the iBiN, the app informs you whether the iBiN has free space to take your recyclables. If the bin is full, the app guides you to the next nearest available iBiN via a Google Map interface.

The iBiNs offer a service that allows the public to recycle waste – anytime, anywhere.

## **Governance**

### **The GreenPak Cooperative**

Businesses trading in Malta are by law required to recover and recycle the resulting packaging waste, waste electrical goods and batteries. GreenPak provides legal compliance to all such organisations.

Established in 2004, GreenPak is the pioneer of post-consumer waste recovery in Malta. In 2010 GreenPak became a Cooperative Society Limited owned by the very companies using GreenPak's compliance services.

The GreenPak Cooperative Society is stronger because of its wider shareholding base with members enjoying more benefits.

Being a [shareholder](#) of GreenPak means:

- Sharing in the profits of GreenPak
- Paying lower company taxes
- Smooth transfer of accumulated profits
- Direct control on the operations of the Scheme

With over 1,200 members, GreenPak remains the most trusted waste recovery scheme in Malta.

## 20. Netherlands

<b>Population</b>	16.655 mil.
<b>No. of local authorities</b>	419 municipalities
<b>No. of companies in system</b>	2,313 members (more than 50 tons of packaging/year)
<b>Packaging introduced to the market</b>	2.748 mil. tons
<b>Recovered waste</b>	1.977 mil. tons of the packaging is recycled 2.191 mil. tons of the packaging is recovered
<b>Types of packaging</b>	Household packaging or commercial packaging

### Legal basis

The “Besluit beheer verpakkingen en papier en karton”, the Dutch packaging decree, makes producers and importers responsible for eco designing their packaging and for reaching material specific recycling targets. Producers or importers are defined as “he who in his profession or acting as a company in the Netherlands is:

- the first to hand over packed products to another;
- the first to import packed products and discards the packaging;
- orders to put his name or mark on the packaging;
- the first to hand over last minute packaging to the user.”

Municipalities are responsible to collect the waste of citizens within their borders based on the “Wet milieubeheer”, the Dutch environment act. Furthermore, they have to collect at least paper/cardboard, glass and plastic packaging separately.

As a result of the laws above, the Ministry of Infrastructure and Environment, the Association of Dutch municipalities and producers/importers have signed a covenant, the “Raamovereenkomst Verpakkingen” or packaging agreement. The first packaging agreement was signed in 2007, the second one in 2012 and is valid from 2013 until 2022.

Based on the desire of all parties, producers/importers guarantee that they will have one, robust organization that finances extended producer responsibility for packaging. Stichting Afvalfonds Verpakkingen is this aforementioned organization. It has signed a contract with large producer association for fast moving consumer goods, non-food and industrial packaging, and by publication in the official Dutch state gazette (“Staatscourant”), this agreement is declared legally binding for all producers/importers.

Stichting Afvalfonds Verpakkingen has taken over the responsibility from producers/importers to reach the recycling targets as published in the packaging decree.

### Packaging organisation/s in Netherlands



Afvalfonds Verpakkingen (‘Packaging Waste Fund’) was established by producers and importers to collectively meet the extended producer responsibilities as stated in the Packaging Decree and Packaging Agreement. It is

a not-for-profit organisation governed by a board of directors, who are themselves appointed by producers and importers.

### System Description

The main goal of **Afvalfonds Verpakkingen** is to implement the Packaging Agreement. To achieve this goal, we focus on the coordination and implementation of various tasks such as:

1. establishing and maintaining a waste management system to achieve national recycling targets;
2. working with municipalities and other parties to compensate for the collection or processing of (separated) waste packaging;
3. the minimisation of packaging litter;
4. monitoring and reporting on the usage, collection, and re-use of packaging materials; and
5. establishing the rates, and collecting contributions from producers and importers.

### Outsourced tasks

The binding Waste Management Contribution Agreement (ABBO, in Dutch) between all producers and importers and Afvalfonds Verpakkingen, came into effect on the 1st of January 2013. Afvalfonds Verpakkingen establishes and collects the packaging waste management contribution and outsources other tasks to various organisations through service level agreements and/or funding. These organisations include:

- **Nedvang**: Monitoring of packaging off the market and recycled packaging waste;
- **Nederland Schoon**: Prevention of packaging litter;
- **Netherlands Institute for Sustainable Packaging**: (Kennisinstituut Duurzaam Verpakken, KIDV) is responsible for the development, consolidation and sharing of factual knowledge about sustainable packaging based on the following principles: reduce, re-use, renew and recycle.

Producers and importers are responsible for collecting and recycling packaging they release on the Dutch market. Afvalfonds Verpakkingen administers this producer responsibility as efficiently and effectively as possible.

The system works according to **the polluter-pays principle**. Producers and importers, all businesses that make or use packaging, are responsible for collecting, sorting and recycling their packaging. So, they fund this themselves, via **the Packaging Waste Management Fee, to Afvalfonds**.

**The more complex the packaging (containing, for example, a blend of different kinds of plastic and paper) the higher the fee.** Fairly and evenly applied. This fee is distributed amongst municipalities, sorters and recyclers for collection and recycling.

Stichting Afvalfonds Verpakkingen is completely committed to achieving the recycling targets, as defined by the Dutch government.

### Prevention

A circular economy is something we build together. Stichting Afvalfonds Verpakkingen is responsible for a larger network. The activities of the organisations within this network are financed by us. The purpose? To ensure producer responsibility is administered as efficiently and effectively as possible.

- **NederlandSchoon** makes the Netherlands a cleaner place by combating and preventing litter.
- **Nedvang b.v**, amongst other things, logs collection and recycling, organises transshipment, sorting and recycling of packaging waste from PMD and post-separation, and maintains contacts with municipalities and waste companies.

- [The Netherlands Institute for Sustainable Packaging \(KIDV\)](#) helps companies to make packaging better for recycling and more sustainable.
- [Statiegeld Nederland](#) is responsible for the coordination and enforcement of the deposit scheme obligation for plastic bottles.

## Governance

### Supervisory Board

Chairman	Independent
Board	CBL representative x 2 FNLI representative x 2 RND representative

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## 21. Norway

<b>Population</b>	<b>5 mil.</b>
<b>No. of local authorities</b>	<b>5 mil. inhabitants incorporated for selective collection</b>
<b>No. of companies in system</b>	<b>5,000 members</b>
<b>Packaging introduced to the market</b>	<b>550,000 tons (including agriculture film, glass and commercial and industrial packaging, excluding PET-bottles)</b>
<b>Recovered waste</b>	<b>230,138 tons of household packaging</b>
<b>Types of packaging</b>	<b>Household packaging or commercial packaging</b>

Norway has implemented the EU-directive for packaging and packaging waste through a covenant between Norwegian Trade and Industry associations and the Ministry of Environment. There are separate agreements for each packaging material. These agreements cover packaging such as plastics, beverage cartons and cardboard, corrugated cardboard, glass and metal.

There is one material company for each of the materials, and each of them has a separate agreement with the Ministry of Environment. (Except glass). Each agreement has its own separate recycling and recovery target, and all of them are higher than the EU-targets.

### Legal basis

The legal basis is the covenant between the Norwegian Ministry of Environment and the material companies. Beside these agreements there is a tax system for beverage containers, where the tax is reduced due to the level of recycling. At 95% recycling the tax disappears. Recycling numbers are being reported annually to the Norwegian EPA. Targets are subject to discussions between the owners of the material companies and the Ministry of Environment.

### Packaging organisation/s in Norway



Grønt Punkt Norge AS (“Green Dot Norway plc”) is a privately owned non-profit company responsible for financing the recovery and recycling of used packaging on behalf of the industrial sector.

### System Description

Grønt Punkt Norge AS (“Green Dot Norway plc”) is a privately owned non-profit company responsible for financing the recovery and recycling of used packaging on behalf of the industrial sector.

Five material companies own Green Dot Norway, which is a non-profit company. Green Dot Norway collects license fees on behalf of all five companies, and in addition, Green Dot Norway runs the recovery schemes for plastic packaging, beverage cartons and cardboard.

Parallel with Green Dot system there are two non-mandatory deposit systems for PET bottles. One is owned by breweries and handles reused beverage containers, mainly PET, but also some glass. The other deposit scheme handles recyclable PET, PE and aluminium cans and is owned by breweries and grocery chains.

It is not mandatory to be a member of Green Dot Norway, but all companies that use produce or use packaging have a responsibility to ensure the packaging is being handled in a proper way. Except for beverage containers, there are no other alternatives than Green Dot Norway.

### **Consumers**

All Norwegian households have the opportunity to sort beverage- and packaging cartons and apps. 95% of households may sort plastic packaging. The municipalities are responsible for the collection schemes.

### **Beverage cartons**

Beverage cartons are packaging for non-gaseous drinks and other foodstuffs such as milk, juice, yogurt, sauces and puddings.

### **Carton packaging**

Carton packaging comprises boxes and containers that are not made of solid or corrugated cardboard, such as those that have contained cereal, biscuits, frozen pizza, toys and electronic components.

### **Plastic from households**

Each year we seem to set new records for material recycling of plastic packaging from households, as more local authorities encourage residents to sort their waste.

### **Aluminium**

### **Plastics**

About 2/3 of all plastic packaging collected in Norway through Grønt Punkt Norge is generated by the trade and industry sectors. This used packaging is much cleaner and homogeneous than household packaging, which makes possible more efficient and less costly sorting and return systems and routines.

### **Prevention**

### **Recycling**

### **Consumer**

All Norwegian households have the opportunity to sort beverage- and packaging cartons and apps. 95% of households may sort plastic packaging. The municipalities are responsible for the collection schemes.

### **Industry**

Approximately 2/3 of all plastic from packaging collected in Norway through Grønt Punkt Norge is generated by trade and industry sectors. This used packaging is much cleaner and more homogeneous than waste packaging from households, making possible more efficient and less costly sorting and return systems and routines.

### **Governance**

Grønt Punkt Norge is owned by the return companies for packaging:

[Sirkel Glass AS](#)

[Norsk Metallgjenvinning AS](#)

[Norsk Resy AS](#)

[Norsk Returkartong AS](#)

[Plasretur AS](#)

The return companies for packaging must ensure material recovery of packaging waste in accordance with [Chapter 7 of the Waste Regulations](#). Chapter 6 applies to beverage packaging.

All return companies in Grønt Punkt Norge are approved by the Norwegian Environment Agency.

The individual company must ensure that packaging waste from businesses and municipalities is collected throughout the country, throughout the year.

The waste regulations set concrete requirements for the degree of recycling of the various packaging materials based on how much is supplied to the market. The schemes are financed by remuneration from the members who, through the return companies, take their statutory producer responsibility. A producer who supplies the market with at least 1,000 kg of a packaging type per year must be a member of an approved return company.

All return companies are obliged to report to the Norwegian Environment Agency on 1 April each year. In addition to the material recovery rate, traceability and optimization of the packaging must also be reported.

#### **The board of Grønt Punkt Norway**

Chairman	Norwegian return carton
Deputy Chair	Norwegian return carton
Board member	Glass Circle
Board member	Norwegian Res
Board member	Norwegian Metal Recycling
Board member	Plastic return

**Norsk Returkartong AS** - The return company for beverage and packaging cartons. Norsk Returkartong is owned equally by packaging manufacturers, product manufacturers and the trade. The board includes representatives from the various owner organisations.

Chairman	The association of grocery suppliers – DLF
Deputy Chair	The Danish grocery trade's Environmental Forum
Board member	The Danish grocery trade's Environmental Forum
Board member	NHO Food and Drink
Board member	Elopak AS
Board member	Tetra Pak AS
Board member	Tina SA
Board member	NHO Food and Drink
Board member	Schur Pack Norway AS

**Plastretur AS** - The return company for plastic packaging. Plastretur is owned equally by packaging manufacturers, product manufacturers and the trade. The board includes representatives from the various owner organisations.

Chairman	The Danish grocery trade's Environmental Forum
Deputy Chair	The Danish grocery trade's Environmental Forum
Board member	The Plastic Industry Association
Board member	NHO Food and Drink
Board member	The association of grocery suppliers – DLF
Board member	The Plastic Industry Association

**Sirkel Glass AS** - The return company for glass packaging. Sirkel Glass is owned by packaging manufacturers, product manufacturers and the trade. The board includes representatives from the various owner organisations.

Chairman	Vinmonopolet AS
Deputy Chair	The Danish grocery trade's Environmental Forum
Board member	Orkla ASA

Board member	The association of grocery suppliers – DLF
Board member	Ardagh Glass Moss AS
Board member	Ringes AS

**Norsk Metallgjenvinning AS** - The return company for metal packaging. Norsk Metallgjenvinning is owned by packaging manufacturers, product manufacturers and the trade. The board includes representatives from the various owner organisations.

Chairman	The Danish grocery trade's Environmental Forum
Board member	The Danish grocery trade's Environmental Forum
Board member	Emballator AB
Board member	The association of grocery suppliers – DLF
Board member	Sherwin-Williams AS
Board member	NHO Food & Drink

**Norsk Resy AS** - The return company for brown paper. Norsk Resy is owned by packaging manufacturers, product manufacturers and the trade. The board includes representatives from the various owner organisations.

Chairman	GlommaPapp AS
Deputy Chair	Smurfit Kappa Norway AS
Board member	The association of grocery suppliers – DLF
Board member	The Danish grocery trade's Environmental Forum
Board member	Ranheim Paper & Board AS

**Treretur** - The return company for wooden packaging. Treretur received approval from the Norwegian Environment Agency at the end of 2021, and started operations in 2022. The return company is currently operated by Norsk Returkartong AS.

Chairman	The association of grocery suppliers – DLF
Board member	The Danish grocery trade's Environmental Forum
Board member	The wood industry
Board member	The Danish grocery trade's Environmental Forum

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## 22. Poland

### Packaging organisation/s in Poland



#### Legal basis

##### Obligation to recycle packaging

If your company markets packaged products, you have related responsibilities, which is regulated by the Act of June 13, 2013 on packaging and packaging waste management.

##### Your responsibilities

1. Ensuring recycling - packaging waste of the same type as that in which you introduced the products to the market.
2. Conducting public educational campaigns - i.e. all activities aimed at raising the ecological awareness of society.
3. Keeping records of the weight of packaging – that you brought to market.
4. Preparing reports to the Marshall's office.

##### Fulfilling responsibilities

- Independently - by ensuring recycling of packaging waste - You bear full legal and financial responsibility for fulfilling your obligations.
- By submitting to the Marshall's office – Product Fee - A quick and simple solution, but very expensive - marshal fees are many times higher than, for example, the cost of cooperation with a packaging recovery organization.
- By delegating responsibilities – Packaging recovery organisation - The most advantageous and most frequently chosen option by entrepreneurs

##### Governance

Coca-Cola HBC Sp. z o.o.	Chair
Rossmann SDP Sp. z o.o.	Deputy Chair
Żywiec Zdrój S.A.	Board member
SIG Combiblic Sp. z o.o.	Board member
O-I Poland S.A.	Board member
Pepsi-Cola GB Sp. z o.o.	Board member
Nestle Polska S.A.	Board member
Procter&Gamble Polska Sp. z o.o.	Board member
Prezero Polska Sp. Z o.o.	Board member
Henkel Polska Sp. z o.o.	Board member

## 23. Romania

Romania transposed European Directive 94/62/EC into Governmental Decision no. 621/2005 regarding the management of packaging and packaging waste, as amended by the Governmental Decision no. 1872/2006 and by the Governmental Decision no. 247/2011. This law states that there are two options for companies who place household packaging on the Romanian market: have their own waste management system or joining an Integrated Management System (SIG).

<b>Population</b>	19 042 936 inhabitants
<b>No. of local authorities</b>	410 administrative units incorporated in the system for selective collection. 9 million inhabitants covered by system
<b>No. of companies in system</b>	2,526 companies
<b>Packaging introduced to the market</b>	651,126 tons
<b>Recovered waste</b>	398,463 tons recycled
<b>Types of packaging</b>	Household packaging. Commercial and Industrial packaging

### Legal basis

**Management of packaging and packaging waste** -Governmental Decision no. 621/2005 amended by the Governmental Decision no. 1872/2006 and by the Governmental Decision no. 247/2011.

- Sets up the obligations for producers and importers for total packaging waste up to 55% recycling and 60% recovery in 2013 and for each type of packaging material – paper, plastic, PET, metal, Aluminium, glass and wood;
- Define the recycling and recovery obligations for producers and importer, as well as for other stakeholders of the system (retailers, generators of waste – population and any legal bodies, central and local authorities).

**License and criteria for recovery organization** – Regulations of Minister of Environment regarding the procedures, criteria for licensing, relicensing, revision, yearly endorsement, issuing and cancelling the operating license, as well as for the approval of the composition and duties of the licensing committee.

**Governmental Emergency Ordinance no. 196/2005** regarding the Environmental Fund.

Establish a contribution of 2 lei / kg of the economic operators which introduce on domestic market sales packaging and packaged goods for the difference corresponding to unfulfilled packaging waste targets.

### Packaging organisation/s in Romania



Eco – Rom Ambalaje is an organization established by the industry, acting as an interface in fulfilling a public interest mission: environmental protection by observing the commitments to reach packaging waste recovery and recycling objectives. By the contract taking over responsibility, Eco-Rom Ambalaje fulfils the objectives related to the recovery and recycling of the package materials introduced on the market by the companies manufacturing or importing packaged products. It was established in order to develop an Integrated Management System (SIG) to implement the specific legislation. At the beginning of 2013 Eco-Rom Ambalaje had already more than 2.526 member companies.

The mission of Eco-Rom Ambalaje is to successfully achieve the recycling and recovery objectives for its clients, to increase awareness of the importance of separate collection of waste packaging among the population, to implement and develop a system of separate collection of waste packaging that concern both economic agents and population, to contribute to the Romanian waste market by facilitating a mix of effective solutions, to moderate dialogues between its clients thus as to enable the development of related activities.

The vision is to implement a nationwide system of separate collection in continuous development, to be an engine for sustainable development of waste packaging recycling market in Romania, to guarantee for its customers freedom of choice for the best solutions by safe fulfilling of the current and future targets for recycling packaging.

## System Description

In anticipation of the Articles of Incorporation and at the initiative of a group of companies active on the domestic market laid the foundations of Eco-Rom Ambalaje and took the initiative of implementing in Romania the “Green Dot” system. SC Eco-Rom Ambalaje SA was set up on the 27th of October 2003. There were established the decision-making bodies consist of Shareholders Meeting, an Executive Committee and the auditing made by KPMG. The share capital of the Company is divided into registered shares, each shareholder is having equal number of shares.

Eco-Rom Ambalaje currently employees are nearly 40 people.

## Prevention

One of the services provided by Eco-Rom to its client portfolio is support in developing and implementing a plan for preventing waste generation. Prevention entails a comprehensive approach aiming to reduce the impact of packaging throughout its life cycle, from selecting raw materials to an effective waste management process.

The current legislation requires that packaging is designed for a minimum use of material to ensuring packaging functions in such a way as to facilitate their reuse, recycling, recovery, or disposal after fulfilling their main purpose.

Eco-Rom Ambalaje is **the first profile organization**, established in 2003 with the aim of fulfilling the objectives of recycling and valorization of packaging waste on behalf of responsible companies that introduce packaged products on the national market. The founders, initiators of the implementation of the economic instrument regarding extended producer liability in Romania, are among the most important producers and importers of packaged products, namely: Argus, Chipita Romania, Coca-Cola HBC Romania, Heineken Romania, Quadrant Amroq Beverages, Mars Romania, Munplast, Tetra Pak Romania, Maspex Romania, Unilever South Central Europe, Ursus Breweries and Bergenbier SA.

Through the responsibility transfer mechanism, **for over 20 years**, Eco-Rom Ambalaje fulfills a mission of public interest, thus contributing to the protection of the environment and the achievement of the national objectives established by the European Directives on the matter. This system is similar to those implemented at the EU level and brings important economic, social and environmental benefits, by mobilizing significant amounts of packaging waste for recycling.

The experience accumulated at the national level as well as the European expertise acquired through affiliation with the PRO EUROPE organization in 2005 [www.pro-e.org](http://www.pro-e.org) , and through the capacity of founding member of

the EXPRA organization, starting in 2013 <http://www.expra.eu/> , positions Eco-Rom Ambalaje as an indisputable expert in the management of packaging and packaging waste.

Starting in 2020, I became a member of **the O IREP Ambalaje association (AOA)** <https://oirep.ro/> , a professional, non-governmental, non-profit, apolitical and independent organization, which aims to promote the interests of members in the context of carrying out specific activities them in the field of packaging and packaging waste management, in relation to the Romanian and European Union authorities, aiming to ensure an optimal financial and operational legal framework for the effective implementation of Extended Producer Liability in full compliance with national legislation and European Directives on the matter.

Starting from **November 2023**, Eco-Rom Ambalaje is **a member of the Circular Economy Coalition Association (CERC)**, an association that promotes at national level the key objectives of the European Commission's circular economy package, namely to stimulate the development of new markets and business models , thus contributing to economic growth and the creation of new jobs ( [www.economiecircularea.eu](http://www.economiecircularea.eu) ). Starting from the basic service "taking responsibility for the fulfilment of the objectives of recovery and recycling of packaging waste", Eco-Rom Ambalaje has developed high-quality services designed to respond to the evolution of the needs and standards imposed by the industry.

Looking back at the last 20 years of activity, we cannot help but notice a series of achievements with a major impact on the industry:

- The volume of materials entrusted to us by over 4300 companies producing and importing packaged goods - over 7 million tons of packaging.
- The volume of processed materials – over 3.4 million tons of recycled packaging waste, of which 3.3 million tons were recycled.
- Development of the first online system for transmitting and managing data on the quantities of packaging introduced on the national market and their recovery/recycling.
- Starting the first separate collection projects from the population and from the premises of central and local public institutions. The Chamber of Deputies of the Romanian Parliament and Bucharest City Hall are the first to benefit from this service.
- Thanks to the financial contribution of its customers, Eco-Rom Ambalaje invested 26,893,226 lei in the separate collection infrastructure and made available over 18,900 containers that serve the population at national level.
- Carrying out research on the perceptions and attitudes of Romanians regarding the separate collection of packaging waste by publishing important studies:
  - nationwide survey to assess the level of information and awareness of the population regarding separate collection.
  - study: perceptions, attitudes and participation in the separate collection and recycling of packaging waste generated in households.
- The launch of multiple national information, education and accountability campaigns regarding the separate collection of packaging waste, among which we list:
  1. "The City of Recycling", in which more than 50 mayors participated.
  2. "Get in the game! Selectively collect packaging waste!"
  3. "Do you have any idea how many useful things you have thrown away?"
  4. "Did you select? You recycled!"
  5. "Collect selectively! Turn packaging waste into prizes"
  6. "Recycling for de-stress"



## Governance

Eco-Rom Packaging received the annual approval decision for the year 2024, communicated through the address of the Supervisory Commission - packaging no. 174070 registered on 18.12.2023.

On 29.11.2022, the Extended Liability Supervisory Commission of the manufacturer decided on the annual approval of the company Eco-Rom Ambalaje, which certifies compliance with legal obligations in 2022 and confirms the right to operate in 2023.

On 30.12.2021, the Extended Liability Supervisory Commission of the manufacturer decided on the annual approval of the company Eco-Rom Ambalaje, which certifies compliance with legal obligations in 2021 and confirms the right to operate in 2022.

On August 27, 2019, the Extended Manufacturer's Liability Supervisory Commission issued operating license no. 12.

Unit rate lei / ton		
Tip material:	Flux municipal	Flux industrial-comercial
Glass	473	440
PET	737	660
Plastic	429	374
Paper, cardboard	429	374
Steel	429	374
aluminum	737	660
Wood	330	37

In judicial reorganisation.

## 24. Slovakia

In Slovakia, there is 12 authorized companies, so it is very competitive market. Instead of sensitive current numbers, you can see some general figures.

Population	5.43 mil.
No. of local authorities	1,638 municipalities in system 3.1 mil. inhabitants covered by ENVI-PAK
ENVI-PAK market share	around 50%
ENVI-PAK total spending on recovery of waste and packaging waste	nearly 14 mil. euros/10 years
ENVI-PAK recovered waste	about 1.2 mil. tons of waste/10 years
Types of packaging	Household, commercial and industrial packaging waste.

### Legal basis

Redesigned Packaging Act No. 119/2010 Coll. became effective as of May 1, 2010. Among other things the definition of obliged industry has been amended in the Act. Based on the Packaging Act, an obliged person is obliged to meet its regulatory duties under the Packaging Act, mainly to ensure packaging waste collection, recovery and recycling at least in the extent of the binding recovery and recycling limits. The packaging Act enables any obliged person to meet its duties via a so-called authorized organization.

- Packaging Waste Law, May 2010
  - The Slovak government is preparing the new Packaging Act, which would become effective from summer 2014.
- Definite targets to 2020 – recover and recycle 50 % household waste.
- Definite responsibility lies with obliged industry – entrepreneur and a legal entity who packs or fills its products in packaging, introduces packed products into market, introduces packages into market with the exception of packaging producers and importers, who supply empty unused packages to obliged industry.

### Packaging organisations



Authorized Organization ENVI-PAK was founded in May 2003. It became the first authorized organization under Art. 8 Par. 2 of the Packaging Act. ENVI-PAK was registered in the Register of Obligated Persons industry and Authorized Organizations of the Slovak Ministry for the Environment under the sequence number OO\_0000001 in August 2004. This year ENVI-PAK is celebrating 10 years being on the market.

ENVI-PAK's management comprises strong and unique companies (multinationals as Coca Cola, Unilever, Nestle, Modules, Pepsi, Tetrapak, Henkel, Procter & Gamble) with international experience and know-how also in the field of compliance with the EU Directive 94/62/EC. ENVI-PAK has developed a coordinated collection, recovery and recycling system of municipal and industrial packaging waste with cooperation of all stakeholders involved in the packaging waste material flow in Slovakia pursuant to Art. 7, Par. 1 of the Packaging Act No. 119/2010 Coll. ENVI-PAK market share is around 50 per cent.

The authorized organization ENVI-PAK helps obliged industry to meet duties in a convenient, transparent, and efficient manner. Moreover, ENVI-PAK offers a broad range of additional practical services: electronic reporting, E-newsletters, monitoring of legislative amendments and Client advocacy, waste management audits conducted directly at the Client's company, free-of-charge professional seminars and training, professional and legal consulting.

The quality of internal processes at ENVI-PAK has been certified by the integrated management quality system under the ISO 9001:2008 Standard (Quality Management System), ISO 14001:2004 Standard (Environmental Management System) and ISO/IEC 27001:2005 (Information Security Management System).

ENVI-PAK was honoured by award the [Golden magnifier](#) for efficiently maintained certified management system in the areas of quality management , environment and information security maintained by ASTRAIA Certification, Ltd. The green award Via [Bona Slovakia 2010](#) as a sign of public recognition was given to ENVI-PAK by Pontis Foundation for environmental project aimed at direct financial and managerial support regarding separate waste collection in Slovak municipalities.

## System Description

**ENVI-PAK** creates a transparent system, open to all entities involved in the waste material flow. Their priority is to constantly streamline the system of sorted collection, and recovery The PRO operates recycling and optimizes its cost. ENVI-PAK operates on a principle of cooperation among all players involved in the waste flow:

- from persons/entities who place on the market or into circulation packaging and non-packaging products,
- through towns and municipalities, which are responsible for introducing sorted collection within their territory,
- collection companies, that provide waste collection and final sorting
- through waste processors, who produce their products from sorted recyclables.

ENVI-PAK:

- Many years of professional track record – **the oldest authorized organization** (now a producer responsibility organization) in Slovakia.
- Repeatedly successfully audited by the Slovak Environmental Inspection Agency.
- Partly foreign-owned, giving direct access to international technical know-how and **involved in a Europe-wide system PRO EUROPE**.
- Granting the rights to use the **GREEN DOT trademark** in the Slovak Republic.
- The quality of the internal processes was certified by the integrated quality management system in accordance with ISO 9001:2008 (Quality Management System), ISO 14001:2004 (Environmental Management System) and ISO/IEC 27001:2013 (Information Security Management System) standards.
- Simple electronic collaboration – reports and applications are completed easily through our website.
- Consultancy in the field of waste management, regular technical seminars and assistance with the preparation of projects and handling of practical problems.
- In 2013, together with 17 organizations worldwide, **founder of the EXPRA alliance, aimed at improving processes leading to the correct application of the extended producer responsibility principle.**



### ENVI-PAK FOR MUNICIPALITIES

ENVI-PAK provides a system for the separate collection of municipal waste.

Services for MUNICIPALITIES:

ENVI-PAK fully finances sorted waste collection systems in towns and municipalities in Slovakia in accordance with Act on Waste.

ENVI-PAK maintains well-established sorted waste collection systems in towns and municipalities and streamlines their operations. The PRO educates and encourages residents in environmental protection and proper sorting of waste.

Redesigned Packaging Act No. 119/2010 Coll. became effective as of May 1, 2010. Among other things the definition of obliged industry has been amended in the Act. Based on the Packaging Act, an obliged person is obliged to meet its regulatory duties under the Packaging Act, mainly to ensure packaging waste collection, recovery and recycling at least in the extent of the binding recovery and recycling limits. The packaging Act enables any obliged person to meet its duties via a so-called authorized organization.

### Prevention

Producers of packaging and non-packaging products, who introduce their products to the market, are responsible for the final destination of their waste, and thus also for the financing of sorted waste collection. They do this collectively through producer responsibility organizations (PRO), such as ENVI – PAK.

On behalf of producers in towns and municipalities we provide sorted collection systems so that the waste can be collected, post-sorted and the sorted waste can be recycled. As PRO we cover the costs of sorted collection directly to the appropriate waste collection company without the additional administrative burden for the municipality.

Hence, the producers cover the costs associated with collection, preparation for reuse, recycling, and purchase of colored containers, as well as wages, energy, and the sorting line costs. This brings budget savings for municipalities and cities – the more waste will be sorted by municipality or town, the lower the costs for disposal of the remaining residual waste. Efficient set up of sorted collection system becomes free of charge for municipalities and citizens.

In cooperation with the municipality or city and a collection company, we define an effective system of collection, sorting and recovery of sorted waste. We know the cost of sorted collection because we have many

years of experience and we work together with many partners in waste management – associations, technical services, and collection companies.

In addition to funding waste collection, we are also responsible for increasing awareness of waste sorting. Therefore, we organize regular free training for our partner cities and municipalities, we teach children in schools to separate waste and to protect nature and we continuously support the education of adults in our cities and municipalities.

## Legal basis

[ENVI-PAK](#) was founded in 2003 by leading manufacturers of packaged products. Since then, we have been providing sorted collection of waste and its recovery and recycling. We became a producer responsibility organization (PRO) on July 1, 2016, after the Ministry of the Interior of the Slovak Republic granted us authorization for packaging and non-packaged products on April 20, 2016. We are therefore the longest operating authorized organization ( [newly the producer responsibility organization](#) ) in Slovakia.

We operate on the principle of cooperation of all entities involved in the waste flow:

- from persons putting [packaging and non-packaged products](#) on the market or into circulation ,
- through [municipalities and cities](#) , which are responsible for introducing sorted collection in their territory,
- collection companies that ensure the collection and sorting of waste,
- up to waste processors who produce their products from sorted secondary raw materials.

## Our services

- We provide a system of collection, recovery and recycling of waste from packaging and non-packaged goods.
- We finance sorted collection in municipalities and cities in Slovakia according to The Waste Act.
- We organise educational activities aimed at promoting sorted waste collection.
- The Responsible Society Project supporting a responsible approach to environmental protection.
- We will help you fulfil your obligations in a convenient, transparent, and efficient way.

## Governance

In the management of the ENVI-PAK producers' responsibility organization, only packaging manufacturers participate equally:

## GUARANTEES

### GUARANTEE OF FULFILLMENT OBLIGATIONS:

- Our activity was repeatedly successfully inspected by the Slovak Environmental Inspection of the Slovak Republic, which verified the performance of professional activities in accordance with applicable legislation.
- We guarantee you enough sorted material necessary to fulfil the collection share and to fulfil the recovery and recycling limits based on cooperation with cities and municipalities, as well as other entities participating in the material flow of waste.

### STABILITY GUARANTEE:

- Only companies with international experience in the field of ensuring compliance with EU directive no. 94/62/EC ( [Coca Cola](#) , [Unilever](#) , [Nestle](#) , [Mondelēz](#) , [Mattoni 1873](#) , [Tetrapak](#) , [Henkel](#) , [Procter&Gamble](#) ), which guarantees stability, security and trustworthiness.

- We are the only producer responsibility organization (PRO) with international know-how involved in [the pan-European PRO EUROPE system](#) , which guarantees our partners the fulfilment of legislative obligations.

#### **QUALITY GUARANTEE:**

- The quality of our internal processes has been certified by an integrated management quality system according to ISO 9001:2015 (quality management system), ISO 14001:2015 (environmental management system) and ISO/IEC 27001:2013 (information security management system), which brings functionality to our clients. and efficiency, environmental orientation and data security.
- Our team is composed of qualified experts with many years of experience in the field, who also gained international experience in cooperation with PRO EUROPE. Regional representatives are familiar with the pitfalls of implementing the waste law in the regions and know how to set up sorted collection for municipalities and cities.

#### **Code of Business Conduct**

Business transparency, quality of services provided, responsibility towards customers and employees are the attributes that govern every modern company that wants to be respected on the market. [By adopting the Code of Business Conduct](#), ENVI-PAK supported its stable position on the Slovak market and its reputation as a company that conducts business honestly and with regard to the interests of all those whose activities may have an impact.

In the Code, we have set the highest standards of behaviour accepted by all employees of the company. Our most important values include professionalism, responsibility, transparency, continuity, experience, and reliability. No less important is ENVI-PAK's care for customers, business partners, employees, and company shareholders. By complying with the Code of Business Conduct, we want to achieve higher business goals and contribute to improving the quality of the environment in Slovakia.

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## 25. Slovenia

<b>Population</b>	2 mil.
<b>No. of companies in system</b>	819
<b>Recycling/recovery</b>	28.789 tons (73 %) recycled 36.062 tons (92 %) recovered

The management of the household (HH) packaging waste in Slovenia is based on shared responsibility between local waste management companies (WMC's) and packaging recovery organizations (PRO's).

The collection of separately collected HH packaging waste is financed by WMC's – they are legally and technically responsible for household packaging waste collection. PRO's get the collected material for free from WMC's.

The sorting and recycling of the HH packaging waste is financed by the PRO's (according to their market share). In Slovenia there are all together 6 operating packaging recovery organizations and except Slopak are all other vertically integrated ones.

The collection, sorting and recycling of the industrial/commercial (I) packaging waste is sole financial responsibility of the PRO's.

The obliged companies have the possibility to enter a PRO (collective scheme) or meet their obligations individually (individual scheme).

The collection network for household packaging is currently established for separate collection of paper, mixed household packaging (plastic packaging, beverage cartons, metal packaging) and glass.

### Legal basis

**Decree on packaging and packaging waste handling** (OG RS No [84/06](#), [106/06](#), [110/07](#), [67/11](#), [68/11 – correct.](#), [18/14](#) in [57/15](#)) – entered into force 23.8.2006

EU Legal acts that were adopted by the Decree on packaging and packaging waste handling or the Decree enables the implementation of these acts:

- Directive 94/62/EC of 20 December 1994 on packaging and packaging waste
- 97/129/EC: Commission Decision of 28 January 1997 establishing the identification system for packaging materials pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste (Text with EEA relevance)
- Directive 2004/12/EC of the European Parliament and of the Council of 11 February 2004 amending Directive 94/62/EC on packaging and packaging waste – Statement by the Council, the Commission and the European Parliament
- Commission Decision of 22 March 2005 establishing the formats relating to the database system pursuant to Directive 94/62/EC of the European Parliament and of the Council on packaging and packaging waste Directive 2005/20/EC of the European Parliament and of the Council of 9 March 2005 amending Directive 94/62/EC on packaging and packaging waste

**Environmental permit, No. 35472-148/2012-5, valid from 31.12.2012 to 15.01.2023**– Permission granted by Ministry for the Environment to Slopak who is authorized to carry out the activities of waste packaging management.

## Packaging organisation/s in Slovenia



Slopak was established in 2002 by the obliged industry to manage the recovery of household and industry packaging waste based on not-for profit and profit-not-for distribution principle.

The collection of HH packaging waste is responsibility of the local WMC's (58), the collection of industrial packaging waste is responsibility of the PRO's and is carried out mainly by subcontractors.

Slopak is financed by the obliged companies (producers, importers, distributors) who pay the packaging fee. All members of Slopak are treated equally regardless of quantities and type of packaging put on the market.

Over the years Slopak also established management of other types of waste: WEEE, waste tyres, waste medicals, waste batteries and residues of plant protection products.

### System Description

In accordance with legislation, in Slovenia, it was established shared responsibility of operative and financial implementation of responsibilities of handling packaging and packaging waste between the WMCs and PRO's.

The WMC's are responsible for the organization, collection and financing of separately collected streams of household packaging waste (glass, paper, mixed municipal packaging -beverage cartons, plastic and metal packaging) and are obliged to pass free of charge all separately collected household waste packaging to PRO's according to their market share.

The PRO's take over the collected packaging waste from WMC's in the collection centres for further processing and recovery. The financing of sorting and recycling of the collected HH packaging waste are responsible PRO's.

The management of industrial packaging waste is organized differently than household packaging waste. The responsibility for the organisation and financing of the collection, sorting and recycling of industrial packaging waste is borne solely by the PRO's.

### Prevention

#### Liabilities of companies

At Slopak, it is essential to ensure that companies comply with their obligations under Slovenian law, in accordance with the principle of **extended producer responsibility**. **Extended Producer**

**Responsibility** means that the producer must take care, at his own expense, of the residues of the products he manufactures, sources or imports and is the first to place on the Slovenian market.

Slovak takes packaging waste, waste electronic and electrical equipment, waste batteries and medicines and is the only company in Slovenia to take waste tyres.

#### Producer responsibility applies to:

- *Packaging,*
- *Electrical and electronic equipment,*
- *Batteries and accumulators, medicines, automobile and tractor tyres,*
- *Plant protection products containing hazardous substances.*

Some waste – such as packaging waste, waste electrical and electronic equipment, waste batteries and accumulators and waste tyres – is made from high-quality raw materials that can be reprocessed to make them

ready for reuse. This saves natural resources and, in most cases, recovery is less energy-intensive than the extraction of the primary raw material, so recovery and recycling also save energy; separate collection, recycling and recovery of waste significantly reduces the proportion of waste ending up in landfill. This extends the lifetime of landfills and means that fewer new landfills need to be built in Slovenia.

Slopak is a not-for-profit company, which acts in the interest of the obliged – the payers of waste management, with the purpose of taking care of your waste according to the rules of economic and environmental efficiency. The system works in compliance with legislation throughout Slovenia.

### **Governance**

The ownership of our company belongs to companies of the Slovenian economy, which are aware of the importance of social responsibility and a professional approach to handling waste packaging.

Recognized companies that support our business model, trust our work in packaging waste management and other schemes and share our values are:

Atlantic Droga Kolinska d.o.o.,  
 Ball pakovanja Evropa Beograd d.o.o.,  
 Coca-Cola Hellenic Bottling Company Slovenija d.o.o.,  
 Dana d.o.o.,  
 Fructal d.o.o.,  
 Helios d.o.o.,  
 Henkel d.o.o.,  
 Ilirija d.o.o.,  
 Kropf d.o.o.,  
 Ljubljanske mlekarne d.o.o.,  
 Makoter d.o.o.,  
 Mlekarna Celeia d.o.o.,  
 Paloma d.d.,  
 Pivovarna Laško Union d.o.o.,  
 Plasta d.o.o.  
 Šentrupert,  
 Pomurske mlekarne d.d.,  
 Poslovni sistem Mercator d.d.,  
 Radenska d.o.o.,  
 Rauch Fruchtsäfte GmbH,  
 Steklarna Hrastnik d.o.o.,  
 Tetra Pak d.o.o.,  
 Tobačna Ljubljana d.o.o.,  
 Vitrum d.o.o.

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## 26. Spain

Population	47 mil.
No. of local authorities	8,116 municipalities 46.7 mil. inhabitants covered by system
No. of companies in system	12,051 companies licensed to ECOEMBES 2,582 companies licensed to ECOVIDRIO*
Packaging introduced to the market	7.4 million tons (2010) including wood, “other” materials, glass and commercial and industrial packaging
Recovered waste	Household packaging 1,285 ktons + 683 ktons glass  – ECOEMBES (2012): 1,200 ktons recycled 85 ktons energy recovered  – ECOVIDRIO* (2012): 683 ktons glass recycled
Types of packaging	Household packaging. Commercial and Industrial packaging is accepted under voluntary agreement provided that Local Entities collect it

Spain transposed European Directive 94/62/EC into Packaging and Packaging Waste Act 11/97. This law states that there are two options for companies who place household packaging on the Spanish market: a Deposit and Return System or joining an Integrated Management System (SIG).

### Legal basis

#### Packaging and Packaging Waste Law, April 1997

- Definite targets for June 30th 2001: Recover between 50%-65%, of which 25%-45% is to be recycled. A minimum of 15% by material. Also, a 10% reduction of packaging weight.
- Definite responsibility lies with packagers, producers, or suppliers. There are choices between, deposit, self-compliance, or membership in a compliance scheme (SIG).
- Responsibility lies with the last possessor of commercial/industrial packaging waste, who has to deliver the packaging waste to an authorized recycler or recoverer. As an alternative commercial/industrial packaging can voluntarily participate in the SIG, provided that the Local Government handles its collection.

#### Royal Decree, which sets forth the Law, 1998

- Sets up the scope of the SIG: household packaging collected by Local Government.
- Some companies (placing more than certain packaging material quantities on the market) must submit a Prevention Plan, which must be approved by regional authorities. These Plans can be prepared under certain conditions by the SIG.

## Law, Royal Decree and Order which transposes Directive 2004/12/EC, 2006

- New targets for December 31 2008: recover 60%, of which 55% has to be recycled. Minimum recycling targets: glass and paper-cardboard 60%; metals 50% plastics 22, 5% and wood 15%.

\*Selective collection of household glass packaging in Spain is handled by Ecovidrio, integrated management System similar to Ecoembes

## Packaging Organisations in Spain



**ECOEMBALAJES ESPAÑA, S.A. (ECOEMBES)** was founded by Spanish industry and trade in order to develop an Integrated Management System (SIG) to implement this legislation, and already boasts more than 12,051 member companies, having signed agreements with 107 local and regional authorities.

The purpose of Ecoembes is to run, in collaboration with local and regional governments, system for selective collection of household lightweight and paper-cardboard packaging waste for subsequent treatment and recovery in order to fulfill the legal recovery and recycling targets in the most environmental and economical efficient way. Besides, Ecoembes provides its licensed companies with technical support in prevention and R&D in order to minimize the impact of packaging waste and make better use for materials.

### Origin and Achievement

We were founded in 1996 in anticipation of Spanish regulation Law 11/97 on packaging and packaging waste. This law sets certain obligations related to packaging waste recovery and its subsequent processing and recycling.

The management formula adopted by Ecoembes is a collective Extended Producer Responsibility Scheme Agreement (SCRAP). 95% of Europe's packaging waste is managed under this model.

We promote eco-design and packaging recycling to ensure plastic, metal and brick containers (yellow bin) and cardboard and paper packaging (blue bin) are increasingly sustainable and can have a second life.

Your company is affected by the Law on Packaging and Packaging waste if your company:

- Trades packaged products with your own brand or retailer's brand, that can reach the final domestic consumer in any part of Spain.
- Packages/manufactures products likely to reach end consumers in Spain.
- Imports packaged products to be sold to end consumers on the Spanish market.
- Is a shop/retailer and supplies a product together with bags, wrappers, trays, baskets, etc
- Sells online to end consumers.

To comply with the Spanish packaging regulations, you must complete the following steps:

1. Fill out the application form.
2. Subsequently, you will receive the contract to be signed in duplicate and posted to Ecoembes. You must also pay a membership fee.
3. The membership fee is: 600 Euros for companies with a general annual turnover (not only in Spain) of 6,000,000 Euros or more. 300 Euros for companies with a general annual turnover of less than 6,000,000 Euros.
4. Ecoembes will verify the contract and send back a copy signed by both parties. After that, your company will receive the credentials to access to our members' website.

5. Companies will have 30 days from the moment the account is closed to submit the packaging declarations for the current year plus the four previous years (this is a clause in the joining contract).
6. Once the packaging declaration has been issued, your company will be invoiced, according to our invoicing calendar. Invoices must be downloaded from our internet portal and paid at the due date. The due date for foreign companies is 30th June.

### **Which packaging must be declared?**

Packaging is any article made of materials of any nature that is used to contain, protect, handle, distribute and present goods, ranging from raw materials to finished products, anywhere along the manufacturing, distribution, and consumption chain.

In the case of commercial and industrial packaging, companies can transfer the responsibility for the packaging to its last owner.

The following packaging must be declared and paid for in the collective Extended Produces Responsibility scheme ("SIG Format"):

- Compulsorily: packaging consumed by individuals. Domestic or household packaging ("SIG packaging")
- Compulsorily: bags used in stores. This refers to those bags that are handed out or bought in stores for consumer to transport their purchased goods. The most common examples are bags with handles and plain plastic bags used to package bulk goods (non pre-packed fruits, sweets, meat, etc.) at the time of sale.
- Voluntarily: if local agencies are responsible for handling the waste. Commercial packaging or non-household packaging (e.g. Pallets, crates, etc.)
- Voluntarily: Industrial packaging. Always to be included in the "NON-SIG" section of the declaration. Industrial packaging is used and consumed in industries and farming or livestock operations.

### **Prevention**

#### **Packaging waste cycle:**

#### **Stages:**

##### **1. Design**

The design of containers and packaging, or "packaging" design, aims to ensure that the packaging meets the requirements of the product it accompanies and how it should satisfy them. These requirements or functions can be classified into technical (conservation, protection, handling, dosage...), logistic (dimensions, channel, type of transport, storage, environmental conditions, commercial (dosage, differentiation, cost, target public...) and legal (technical-sanitary aspects, information obligations...). There are companies specialized in industrial design and manufacturing companies usually have specialized teams.

##### **2. Manufacturing**

Packaging manufacturing could be defined as the transformation of raw material into a packaging element since a package is usually composed of different elements (bottle or flask, cap or closure, label, grouping elements...). Packaging manufacturing processes are very complex and diverse and depend on both the material and the final application, so they are usually carried out in specialized facilities. Companies specialized in the manufacture of packaging are usually called manufacturers or converters.

##### **3. Packaging**

Packaging a product consists of conditioning it to satisfy the functions defined in the packaging design phase. To package a product, different actions are normally necessary (stocking, filling, closing, labeling, grouping,

palletizing...) and use different elements (bottles, cans, jars, boxes, films, pouches, caps, lids, labels...) which can be made of different materials (plastics, metals, paper/cardboard, glass, wood...). Companies that use packaging to market their products may be called packagers.

#### 4. Distribution

The distribution of packaged products consists of a whole series of necessary actions (transport, storage, repackaging, picking, replenishment, stock control...) to get these products from the place where they are manufactured to the final consumer through various channels. Trading or distribution companies may be called distributors.

#### 5. Consumption

This can be defined as the action that occurs when the packaged product fulfills the function for which it was manufactured, although it is usually also associated with the act of selling the product. Generally, except in the case of reusable packaging, the result is that the packaging has finished fulfilling the functions for which it was designed and generates packaging waste to be managed. In the case of household packaged products, the consumers are the citizens themselves.

#### 6. Separation

Waste separation, also called contribution, can be defined as the amount of packaging waste that citizens separate into different types (plastic packaging, cans and briks for yellow, paper and cardboard packaging for blue, glass packaging for green...) and deposit appropriately in the means provided for their subsequent selective collection (containers, bins, waste garbage cans, etc.).

It is normally defined in terms of kg per inhabitant per year and is one of the main indicators of the level of performance of selective collection. In the case of household packaging waste, it is the citizens who are responsible for the correct separation.

#### 7. Collection

The selective collection of packaging waste is the set of actions and means that make it possible to take this type of waste from the point of contribution, where the citizen disposes of his previously separated packaging waste, to a facility for its recovery, disposal or prior storage. In the case of household packaging waste, local authorities are responsible for the collection of this waste, and they can comply with this obligation by providing the service through public companies or by issuing public invitations to tender.

#### Governance

A non-profit organization that manages the recycling of waste that is placed in the yellow and blue container. We work together with citizens, public entities and companies to make the recycling of household packaging a reality in Spain. Since 1996 we have helped promote environmental awareness to make recycling a daily habit for the Spanish population, contributing to making this world a better place to live.

For Ecoembes, because of what it is, what it does and represents, it is essential to generate **relationships of trust** between all the agents that make up the recycling ecosystem. And it is in this framework that good governance becomes an essential pillar and the basis for building a **responsible management** approach, aligned with the best practices and recommendations of reference organizations, being supervised at the highest level.

There are great challenges to face that can only be addressed through good governance. Our commitment to continuous improvement in this area is resounding and is articulated through a set of principles, policies and good practices. Our code of ethics is the compass that inspires us and guides our conduct for all of us who make up the organization. The internal regulations provide us with the rigor to comply with each and every one of the commitments.

In this framework, since December 1, 2023 and making use of the possibility granted by article 50.3 of Law 7/2022, Ecoembes complies with its obligations through an administrative entity, Ecoembes Entidad Administradora SLU, a limited company without intention. for-profit, which has its own legal personality and is differentiated from that of the collective system, acting under the direction of the latter for the sake of greater efficiency and transparency in the development of its activity.

All government bodies and governance structures constitute spaces where active listening, dialogue and collaboration can be deployed, for the sake of a circular future. Finally, our corporate culture project is the driver of the values that allow us to project our integral and purposeful way of doing things.

See **Ecoembes Governance Model manual** available on-line.

### Board of Directors

President	IDILIA FOODS SL
Vice President	President of the Audit Committee
Secretary	Secretary of the Council
Deputy Secretary and Legal Advisor	Vice Secretary of the Council
Advisors	Chairman & CEO of DEOLEO
	Purchasing Director of PGC of ECI
	General Director of External Relations of Mercadona
	Vice President & General Manager of Procter&Gamble Iberia and Procter&Gamble Spain
	CEO of Lactalis Iberia Group
	General Director IFA
	General Director of SA DAMM
	General Director of Coca-Cola Iberia
	General Director PepsiCo -Southwest Europe
	General Director of the consumer producer division of Spain and Portugal of L'OREAL ESPAÑA SA

### Collaborators and Alliances

Ecoembes bases its activity on public-private collaboration to coordinate a collective response to an increasingly strong social demand: advancing the circularity of packaging. To achieve this, we believe in the transformative power of alliances with civil society organizations, which allow us to strengthen the social and environmental dimension of the actions we carry out.

We act within the **framework of SDG 17 of the Sustainable Development Goals of the 2030 Agenda** to generate alliances and collaborative projects to multiply our positive impact on the environment and society, contribute to progress in sustainability and join forces in the face of global challenges. that we face from the circular economy, in order to create a responsible society that respects our environment.

We work with very diverse social and environmental agents, from consumer organizations and neighbourhood associations to worker representatives, as well as with multiple environmental and ecological foundations and organizations.

- **Shareholders** - Ecoembes is the fruit of the trust of our shareholders, who founded this organization to materialize a commitment to efficiency and environmental respect based on ethics and transparency. We apply a responsible approach to our activity, which prevents any economic, social, and environmental risk.

- **Member Companies** - represent a basic pillar of the organization, since they collectively contribute to the implementation of the Packaging Waste SCRAP. We offer a quality service that facilitates compliance with the obligations established by Law, at an appropriate cost. Likewise, we create tools that improve the environmental performance of packaging.
- **Recoverers and Recyclers** - give packaging a new life by incorporating it back into the production process. At Ecoembes we are committed to offering selected materials with the agreed quality, awarding them transparently and promoting free competition in the market.
- **Material Entities** - represent the manufacturers and/or recoverers and recyclers of packaging material. At Ecoembes we rely on their specialized knowledge of materials to jointly carry out packaging studies, monitor trends and research to improve the recyclability of these materials.
- **Employees** - are our most valuable asset and the reason for our success. We respect the diversity of our staff, which fosters a work environment of collaboration and professionalism. We also implement conciliation measures that make it possible to make work obligations compatible with family and personal life.
- **Public Administrations** - We actively collaborate with Public Administrations so that the collection and selection systems for packaging waste are efficient, from an economic and environmental point of view. The Integrated Management System coordinated by Ecoembes is an example of the benefits of public-private collaboration. In this relationship, efficiency, environmental protection, technical advice and citizen service come together.
- **Media, other SIGs, NGOs etc** - Ecoembes bases its relationships on transparency, collaboration and respect. We are open to reporting on the performance of the Integrated Management System and its environmental achievements, as well as cooperating on projects of mutual interest.
- **Suppliers** - At Ecoembes we base our relationship with suppliers on mutual trust. We apply objective selection criteria that focus on technical, economic, and corporate responsibility aspects.
- **Citizens** - The collaboration of citizens is the key to recycling packaging and its waste. For this reason, we communicate both the GIS assessment results and the preventive efforts of packaging and distribution companies, to minimize the impact of packaging, with total transparency. Furthermore, we are committed to carrying out our mission to contribute, from the packaging waste sector, to sustainable development.



## The Model

The recycling of waste glass containers is mandatory in all Member States of the European Union, with the aim of protecting the environment and rationalizing the use of resources.

For the model to work, it is essential to collaborate side by side with packaging companies, Public Administrations and citizens and hoteliers. In this sense, each one has an important role to play.

Ecovidrio is the Collective System of Extended Producer Responsibility (SCRAP) and is non-profit. It is responsible for:

- Mobilize the entire society through awareness campaigns to recycle their glass containers.
- Install containers and manage the collection of waste from all glass containers throughout the territory, based on two different management models, which we offer to local entities for the collection of glass containers. One option is for the municipalities to be in charge of the collection service and we finance the corresponding cost. Another is that we directly take charge of the operations necessary to guarantee selective collection through the container.

- Implement specific plans such as support plans for the hospitality industry, reinforcement plans in times of high consumption, personalized plans to the characteristics of each territory, etc. taking responsibility for the entire recycling chain.
- Ensure that all glass collected is sent to the treatment plant and then incorporated into the manufacture of new containers.
- Ensure that the recycling objectives set by the European Union are met.
- Receive financing to manage the recycling of packaging that companies put on the market through the Green Dot quota and the sale of waste. As a non-profit entity we need to have the quotas of the participating companies to guarantee the recycling of single-use glass containers.
- Provide transparent and audited information on glass container collection data to the different competent public administrations and to society.
- Justify the efficiency and effectiveness of the management to the companies that have delegated to us the legal obligation to take responsibility for glass container waste.

### Legal Basis

In 1997, the Law on Packaging and Packaging Waste 11/1997 - the result of the transposition of the European Directive 94/64/EC on Packaging and Packaging Waste - established for the first time the obligation that companies that market a product for the first time packaged on the market deployed the means to reduce the environmental impact of that waste.

It was a revolutionary milestone: companies cannot be content with selling their product, they must take responsibility for the environmental impact of the waste they generate! We call this concept Extended Producer Responsibility.

This is how Ecovidrio was born: a non-profit entity financed by these companies to, through it, face their responsibility. With this mandate we began to operate throughout Spain in 1998.

In 2022, with the approval of the Law on Waste and Contaminated Soil and the Royal Decree on Packaging and Packaging Waste, the existing regulatory framework was updated. This update meant the establishment of new and expanded obligations for packaging companies.

### Functions of Packaging Companies

- Comply with their legal obligations associated with the generation of the waste they put on the market, through Ecovidrio. You have all the information at: packaging companies.
- Financing the glass packaging waste recycling system through the Green Point rate.
- Control and certify the correct management of Ecovidrio under the criteria of effectiveness, efficiency, sustainability, and transparency.
- Promote the sustainability of packaging from its design and production.

### Functions of Public Administration

- **European Union** - It establishes the regulatory framework and minimum European recycling objectives, ensuring compliance with the legislation in all Member States.
- **Government of Spain**
  - Approves the basic regulations at the state level, establishing the criteria and requirements that must be met throughout the territory of the State.
  - Approves national waste prevention and management plans, which include policies to promote packaging waste management.
  - Determines recycling objectives at the state level and ensures their compliance.
- **Competent Ministry**
  - It calculates and publishes annually the glass container recycling rate achieved in Spain.

- Coordinates actions with the Autonomous Communities.
- **Autonomous Communities**
  - They grant authorization to Ecovidrio by which they recognize it as an extended producer responsibility system that guarantees the recycling of glass packaging waste generated in its territory.
  - They sign framework agreements or agreements with Ecovidrio. They establish the conditions of the collection and the actions that will be carried out (awareness campaigns, initiatives for the hospitality sector, collection operations, etc.).
- **City Council and other local entities**
  - They have direct responsibility for the management of glass packaging waste.
  - They sign collaboration agreements with Ecovidrio (or adhere to the framework agreements signed with the Autonomous Communities) that establish the conditions, mobilization campaigns and details of the glass container collection service.
- **Functions of citizens and hoteliers**
  - Its task is to separate and deposit glass container waste in green containers. They are the ones who start the recycling chain!

## Corporate Governance

**The Board of Directors** is responsible for managing and administering Ecovidrio, as well as executing the General Assembly's decisions. In addition, it submits the annual revenue and expenditure budget, the accounts for the last closed financial year and the annual report to the General Assembly for approval.

Chair	Brewers of Spain
Vice Chair	Spirits Spain
Directors	Brewers of Spain - 4 representatives Spanish Wine Federation – 3 representatives Spirits Spain – 1 representative Spanish Cider Association – 1 representative

## Assembly

The General Assembly is responsible for approving the corporate management and, where applicable, the accounts for the last closed financial year, the annual report and the budgets for the current financial year.

## Affiliate Partners

Spanish Cider Association	Spanish Wine Federation
Valle, Ballina & Fernandez	Miguel Torres
Envasados Eva	Pernod Ricard
Brewers of Spain	Beam Suntory Beverages Spain
Heineken Spain	Bacardi Spain
Damm	Bardinet
San Miguel	Codorniu
Estrella	Friexenet
Agora Group	

**Collaborators**

Glass Spain

Santos Jorge Waste Management

FCC Ambito – waste management and environmental services

Andalusian Glass Recovery

Barcelona Glass Recovery

Vidrala – glass packaging and bottle manufacturing

BA Glass – glass production

Vidrieria Rovira OI – glass production

Verallia – design, manufacture and recycling of glass

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## 27. Sweden

<b>Population</b>	9 mil.
<b>No. of companies in system</b>	10,000 licence partners
<b>Packaging introduced to the market</b>	932,837 tons excluding deposit scheme packaging
<b>Recovered waste</b>	Recycled 665,895 tons packaging waste (excluding deposit scheme packaging)
<b>Types of packaging</b>	Household, commercial and industrial

### Legal Basis

Material	Recycling 2013	Recovery target
Paper/carton/corrugated board	77,2 %	65 %
Metals 1)	73,1 %	70 %
Plastics 1)	36,7 %	30 %
Glass 1)	89 %	70 %

1) excluding packaging in deposit schemes, where recycling (reuse) rate is close to 90 %

### Financing

Collection and recycling system costs approximately 1.5 million US dollars to run each year.

Part of the financing is done through the collected material value, but it does not cover the entire cost. The manufacturers pay a packaging fee. The charge is weight based and differs between the different materials and the household and commercial packages, depending on how they economically put pressure on the system.

There is no fee for newspapers, the companies behind the materials company Pressretur pays for the material and covers all the costs. Financing of glass packaging is administered with fees through Svensk GlasÅtervinning. Reports and payment are made monthly, quarterly or – for smaller companies – on a yearly basis.

### How are the licence fees calculated?

The packaging fees are set by the material companies. They are based on weight and charged on the basis of reports submitted by FTI's customers as a monthly, quarterly or yearly payment for the preceding period. Fees for glass packaging are paid directly to Svensk GlasÅtervinning

The packaging fee is only to be collected at one stage. In principle, the packaging fee is to be paid by the filler. Further fees can apply, for instance the import fee on all sales, industrial and transport packaging around items that are imported or brought from another EU country. In addition, there is the fee for packaging used (packed or filled) in Sweden on all packaging which is added to goods or already packed goods: A fee is to be paid if the manufacturer has not already paid.

To prevent all shops, catering establishments, restaurants, pizzerias, hot dog stands, consumers, bakeries, launderettes, banks, offices etc. from having to join just because they fill packaging, a fee for some packaging is charged to the manufacturer and the party which imports the packaging itself. This applies inter alia to plastic

bags, standard bags/sacks, pizza cartons, cake cartons, hot-dog trays, plastic film and aluminium foil, wrapping paper, salad containers, disposable cutlery, etc. These packages are called service packaging and special regulations apply to them. Companies which manufacture or import service packaging have to pay a packaging fee for this. (There is an option to let a subsequent party – e.g. a packaging wholesaler – “take over” the obligation to pay the fee, which however requires an explicit agreement between the parties concerned and FTI.)

### Packaging organisation/s in Sweden:



FTI (Förpacknings- och Tidningsinsamlingen) is a company in the recycling industry that is responsible for ensuring that packaging and newspapers in Sweden are collected and recycled.

We are responsible for the 5 800 recycling stations around the country where people can leave their used packaging and newspapers. The collection system is financed inter alia by packaging fees paid by the producers that import, fill, package and sell the products.

Packing fees for packing of paper, plastic and metal are administered by FTI. Operations are conducted without profit and no economic dividends to the owners may be allowed under the company’s charter.

Our business is based on government regulations on producer responsibility for packaging and newspapers. The producer responsibility is a standard that has been created to develop an environmentally sustainable society for the future.

The visionary scenario is a circuit adapted society where most of what is currently regarded as waste will be useful as some kind of new resource. The principal method adopted by Parliament in 1993 for this work is to put environmental responsibility on the producer of a product. Producers shall be obliged to take care of the packaging even after the consumer end use.

Owners of FTI are the five materials companies Plastkretsen, Metallkretsen, Returkartong, Svensk GlasÅtervinning and Pressretur. There is also Svensk GlasÅtervinning with an agreed collaboration. The FTI’s and materials companies’ boards include representatives from the packaging and newspaper industry, commerce, and trade associations.

Our head-office is in Stockholm, but some of our staff is also located in other parts of Sweden.

“Purchasing this ‘collection system service’ from us is simply a matter of companies complying with their statutory producer responsibility – to provide their own clients with a national collection system for packaging.” says Anette Löhn, head of marketing at FTI.

FTI is a commercial service function with the aim that affiliated companies will be able to more easily benefit from the goodwill generated by helping to finance a collection system that is highly appreciated by their clients. FTI is seen by the public at large as being supported by a considerable portion of the Swedish business community.

We always work for the best interests of companies with producer responsibility.

### Note!

FTI has been phased out as of 1 January 2024 and the collection of packaging has been taken over by the municipalities. The background is the new regulation on producer responsibility that the government decided on in the summer of 2022.

From 1 January 2024, recycling of all types of packaging will be handled by approved producer organizations (PROs).

### **System Description**

The Swedish government introduced producer responsibility in 1994. It means that companies that place packaging on the market are also responsible for collecting the packaging for recycling. To meet this new requirement, the business community joined forces and formed materials companies, which subsequently formed the Packaging Collection Service (FTI).

### **How operations are financed**

FTI is a not-for-profit operation. The activities are financed by packaging fees from producer responsibility companies, funds from the paper industry and revenue from sales of collected and sorted material.

Annual operating costs for the collection and recycling scheme are approximately SEK 1 billion. Some of the financings are derived from sales of collected and sorted material. The value of the collected materials covers some, but not all, of the costs. That is why producers are charged a packaging fee. The fee is weight-based and varies for each type of material as well as for household or commercial packaging, depending on the economic impact of the material on the scheme.

FTI is a non-profit company. Any profit is therefore used to finance the operations. It is not permitted to distribute any profits. The aim is to achieve a zero balance over a business cycle.

### **Reference for operations**

Operations are governed by the Ordinance on Producer Responsibility for Packaging. An ordinance is a law that has been adopted by the government. FTI helps companies comply with the ordinance which means, in simple terms, that we collect and send as much household packaging as possible for recycling.

In November 2021, the Swedish Ministry of the Environment drafted a memorandum “Improved packaging collection – new roles for municipalities and producers.” It is a proposal for a new ordinance on producer responsibility for packaging.

The document contains a number of proposed changes to producer responsibility, including that municipalities assume the responsibility for collecting packaging. Producers would continue to finance this arrangement.

In February 2022, FTI submitted a response to the consultation document, where we provided feedback on the proposals that we support and those we consider less viable.

In January 2022 wastepaper was exempted from producer responsibility and the responsibility for wastepaper collection was transferred to Swedish municipalities. In 90 % of the municipalities in Sweden, FTI provides space for the municipality’s wastepaper collection at recycling stations, but the municipality is responsible for the collection. You should therefore contact your municipality if you have any views or questions about the wastepaper collection.

### **Prevention**

The collection and recycling of packaging is financed by packaging fees. Every type of packaging should bear its own costs, and that’s why there are different fees for each type of material.

The costs for collecting and processing packaging from a small producer are the same as from a large producer. The fees are non-negotiable.

## Fees for 2023

In 2021, FTI packaging collection hits a new all-time high – for the tenth consecutive year – and together with their owners (Returkartong, Svensk Plaståtervinning and Metallkretsen), FTI collected and recycled more packaging than ever. This is one of the reasons why FTI doesn't need to raise the fees for paper, plastic and steel packaging for the coming year, and why the fees for aluminium will be lowered.

	Item no.	Material	Fees SEK/kg	Fees SEK/kg
			2022	2023
<b>Household packaging</b>	310	Paper (high)	3,43	3,43
	315	Paper (low)	2,24	2,24
	410	Plastic (high)	8,56	8,56
	415	Plastic (low)	5,52	5,52
	511	Aluminium	8,00	6,00
	512	Steel plate	4,20	4,20
<b>Commercial packaging</b>	320	Paper	0,01	0,01
	420	Plastic	0,03	0,03
	521	Aluminium	0,01	0,01
	522	Steel plate	0,16	0,16
<b>Service packaging</b>	330	Paper (high)	2,75	2,75
	335	Paper (low)	1,79	1,79
	430	Plastic (high)	6,85	6,85
	435	Plastic (low)	4,42	4,42
	531	Aluminium	6,40	4,80

## Differentiated fees are driving progress

Differentiated fees mean that you pay a lower fee for packaging that is designed for recycling, compared with packaging that is difficult to recycle. The aim of differentiated packaging fees is to reflect the actual cost of recycling. In that way, the fees provide an incentive for producers to design packaging that is easier to recycle. We can help you design packaging that is more sustainable and easier to recycle.

## Owner and Board

FTI is owned by the four material companies Svensk Plaståtervinning, Returkartong, Svensk Glaståtervinning and Svenska Metallkretsen and has managed the collection of packaging on behalf of the material companies.

## FTI's relationship with the material companies

FTI's operations have been based on producer responsibility for packaging. Producer responsibility means that the company that puts packaging on the Swedish market is responsible for ensuring that it is collected and recycled. Producer responsibility was introduced in 1994 by the government. In order to meet the new

requirement, the business community came together and formed material companies, which in turn formed Pörpackningsinsamlingen (FTI). FTI has been responsible for the collection of packaging on behalf of its owners in the material companies.

### **FTI's Board**

Chairman Independent – retired FMCG CEO with broad board experience

#### **Directors MetallKretsen - The Metal Circuit**

MetallKretsen is the materials company for metal packaging that is covered by producer responsibility for packaging in Sweden. MetallKretsen AB is jointly owned by fillers, (those who fill the packaging with goods) importers and the trade: DLF (Dagligvarupöllöderers förbund) and Svensk Dagligvaruhandel.

*The role of PRO appears to now sit with Näringslivet's Producer Responsibility, an approved producer responsibility organization.*

#### **Swedish Plastic Recycling**

Swedish Plastic Recycling offers circular recycling of plastic packaging for businesses with producer responsibility. At the Site Zero facility in Motala, which is the world's largest and most efficient plastic recycling facility, Swedish Plastic Recycling receives packaging from Swedish households. Here they are recycled completely circularly and with the lowest possible climate footprint. There is no similar facility in the world. Swedish Plastic Recycling drives the development of circular plastic recycling and is owned by large parts of the Swedish business community through the Plastic Industry's Information Council (IKEM and SPIF), the Association of Grocery Stores, Swedish Handel and Swedish Daily Goods Trade.

*Swedish Plastic Recycling appears to operate as an approved producer responsibility organisation.*

#### **Swedish Glass Recycling**

Swedish Glass Recycling is responsible for the collection and recycling of glass packaging in Sweden. Swedish Glass Recycling commissioned FTI to plan and develop the joint recycling stations. Swedish Glass Recycling organized its own collection but worked closely with FTI. For example, FTI has had a mandate to check that the contractors fulfil their commitments. Svensk Glass Recycling AB is jointly owned by its clients: Ardagh Glass Limmared AB, DLF (Daily Goods Suppliers Association), Spirit & Wine Suppliers Association, Svensk Dagligvaruhandel and Sveriges Bryggerier.

*The role of PRO appears to now sit with Näringslivet's Producer Responsibility, an approved producer responsibility organization.*

#### **RK Returkartong (Return Carton)**

Returkartong is the material company for paper packaging that is covered by producer responsibility for packaging in Sweden. The owners represent the entire packaging chain from material manufacturers, packaging manufacturers, fillers (those who fill the packaging with goods) to importers, trade and distributors: Holmen, DLF (Dagligvarupöllöderers förbund, Fiskeby, Svensk Dagligvaruhandel, TetraPak, Stora Enso, DS Smith, Smurfit Kappa, Billerud Korsnäs, Grafiska Företagen, SCA, Swedish Trade, Elopak and the Swedish Cardboard Packaging Association. From 1 January 2024, recycling of all types of packaging will be handled by approved producer organizations (PROs).

*N.B. The business that Returkartong previously conducted has been taken over by the PRO Näringslivets Producentansvar AB (NPA).*



By law, all companies that place packaging on the Swedish market have producer responsibility. The basic idea of producer responsibility is to reduce littering, reduce the amount of waste and to ensure that the waste that does occur is recycled and used for new products.

**Näringslivets Producentansvar** is a new company and approved producer responsibility organization that was formed to meet new demands on producer responsibility for packaging. The new producer responsibility regulation places higher demands on producers with the aim of achieving a higher degree of material recycling.

With industry organizations as owners, the company gets a strong foundation and great influence opportunities for affiliated producers. Together, we drive development towards circular flows - so that more packaging can become packaging again.

Näringslivet's Producer Responsibility is an approved producer responsibility organization that works to drive development towards circular and traceable material recycling - so that more packaging can become packaging again.

For producers, we offer comprehensive expertise in all matters related to producer responsibility - from design for recycling to accounting, reporting and legal requirements.

We also offer free reception sites for businesses that must hand over packaging waste for recycling.

### **Legal Basis**

In the role of producer responsibility organization, our operations are based on the regulation on producer responsibility for packaging. In June 2022, the government presented an update to the regulation. The new regulation means that the municipalities must be responsible for collecting packaging waste from households, starting from 1 January 2024.

The purpose of the new packaging regulation is, among other things, to:

- to reduce the amount of packaging and packaging waste.
- producers must take responsibility for collecting and treating packaging waste – operationally or financially.
- achieve the goals for material recycling.
- reduce litter.

Many different actors need to contribute in order for the purpose of the regulation to be achieved. On this page, you can read about how the distribution of responsibilities will look when the changes come into force.

All producers who place packaging on the Swedish market must be affiliated to an approved producer responsibility organization, PRO, no later than 1 November 2023. Through the PRO, the collection, reception and recycling of all packaging materials from households is financed, from and including 1 January 2024.

The new regulation also means that from 2023/2024 all producers must:

- pay for municipal collection of packaging, receipt of packaging from businesses and recycling of packaging.

- report packaging for private use and for other than private use, which are placed on the market, at least quarterly.
- contribute to meeting the national targets for material recycling rate and packaging waste.
- only provide packaging that can be reused or recycled.

Requirements from 2022/2023 onwards:

- The producer must register per product category and report the number according to the single-use plastic directive once / year.

Requirements as of 2021:

- The producer must register with the Swedish Environmental Protection Agency.
- Producers must report their packaging volumes (both for consumer and non-consumer packaging) to the Swedish Environmental Protection Agency, including composite, 1 g vapor /year.

On behalf of our affiliated producers, we as the producer responsibility organization are responsible for recycling the producers' packaging of all types of materials (paper, plastic, metal, glass, wood and other materials such as textiles, porcelain and others).

We ensure reporting to the Swedish Environmental Protection Agency for all our affiliated producers and ensure that the municipal collection is paid.

As PRO, we must also collect our share of the collected material in all of Sweden's municipalities. The organization that has the largest market share for packaging for other than private use is also responsible for arranging and running reception points for these.

The producer responsibility organization is responsible for:

- packaging waste is treated in accordance with current regulations.
- effectively contribute to reaching the material recycling targets and the targets for reduced litter in the packaging regulation.
- work to ensure that affiliated producers increase the proportion of reusable packaging that is placed on the market and otherwise prevent packaging waste.

### **Responsibility of the Swedish Environmental Protection Agency**

The Swedish Environmental Protection Agency is a government agency that runs and coordinates environmental work in Sweden, on behalf of the Swedish government. The Swedish Environmental Protection Agency's mission includes working based on the regulation (2022:1274) on producer responsibility for packaging. It is the Swedish Environmental Protection Agency that approves which producer responsibility organizations are allowed to collect and process packaging waste.

The Swedish Environmental Protection Agency shall:

- Inform about producer responsibility.
- Exercise supervision and notify regulations, exceptions, and exemptions.
- Decide on the compensation to the municipalities.
- Ensure that producer responsibility organisations, municipalities, market-driven systems, property owners and environmental organizations have an ongoing dialogue.
- Follow up the national recycling targets and report to the EU.

### **The municipalities' responsibility**

From 1 January 2024, Sweden's municipalities are responsible for collecting packaging waste from households and co-located businesses. From 2027, property-related collection (FNI) must be introduced for all

households, for paper, plastic, glass, and metal packaging. The municipality must also ensure that there are easily accessible collection points for bulky packaging and collect packaging material in squares and parks from 1 January 2026.

They must also provide transshipment stations where the producer responsibility organizations must collect their share of the collected material for further transport to reception facilities, and where applicable to a recycling facility.

Other municipal waste is handled by the municipalities themselves.

### **Producers connected to the Business Producer Responsibility**

As of November 1, 2023, all producers must be affiliated to an approved producer responsibility organization, and through it finance the collection and recycling of all types of materials.

In order for producer responsibility for packaging to function as intended by the regulation, it is required that all producers take responsibility and contribute by complying with the legal requirement that:

1. be registered as a producer with the Swedish Environmental Protection Agency and
2. be affiliated with an approved producer responsibility organization.

It is a question of competition on equal terms for a fair and functioning market. Producers who accept their responsibility should not have to finance the collection and recycling of packaging placed on the market by producers who do not meet the legal requirements. Free riding contributes to a distorted competition among producers, especially when the cost of recycling increases with the higher requirements that the new regulation imposes on producers.

### **Equal for all**

Regardless of whether the producer puts large or small volumes on the market, all producers pay the same fee for the same type of packaging. The packaging fee finances the costs of collection and recycling, but also constitutes an important resource for innovation and development. The more producers who participate and pay, the greater opportunities we have to drive development towards circular material flows.

### **Packaging Charges**

Each package must bear its own cost. Producers finance the cost of the municipal collection and the recycling of packaging by paying a packaging fee. Pricing must be transparent and fair. The cost is the same regardless of whether you are a large or small producer. All producers who are connected to Näringslivet's Producer Responsibility therefore pay the same packaging fee. Näringslivet's Producer Responsibility does not distribute any profit to its owners - what you pay is used to increase recycling in Sweden.

### **Fees**

All producers pay an annual fee of SEK 2,500. After that, packaging fees based on reported kilos are added. All prices on this page are stated excluding VAT. The minimum total amount for a producer is SEK 3,000 per calendar year. It includes the annual fee and packaging fees.

The Swedish Environmental Protection Agency announces quarterly changes that affect the costs and thus the fee. Above all, it refers to the expansion of municipal collection, as well as changes to the compensation level for the municipal collection system (recycling stations, collection near properties, etc.). The costs are therefore variable, and our ambition is to adjust the fees annually.

Differentiated fees mean a lower fee for packaging that is designed to be recyclable, than for packaging that is difficult to recycle. A package that is designed to become a new raw material must share in the income it generates after sorting and recycling. The idea of differentiated packaging fees is also to create a means to

steer the development towards increased material recyclability. You can use our help to design more durable packaging that is easier to recycle.

### **Criteria for green and yellow fee level for plastic packaging, valid from 1 January 2024 to 1 July 2024**

From 1 January 2024, three levels will be introduced for the packaging fee for plastic packaging. This differentiation means an opportunity for a lower packaging fee for plastic packaging that can be more easily recycled.

### **The basis for our packaging charges**

Transparency and fairness are the basic principles for working with our packaging fees. With us, the fee levels are the same for everyone, we do not differentiate between affiliated producers. Our fees are normally adjusted annually, and then at the beginning of the year. It is our principle to inform about changes as early as possible, no later than three months before they come into effect.

### **This is how the packaging fee works**

As a producer responsibility organization (PRO), Näringslivet's Producer Responsibility works for transparency, both regarding circularity and finances. Business Producer Responsibility is run entirely without profit interest. We therefore work to ensure that our costs and income are even over time.

The fees that the Danish Producers' Association collects from producers are used to cover the costs that we have as PRO. In addition to the packaging fees, our income consists of the sale of certain packaging waste as raw material, while our expenses consist of costs for collection, recycling, and administrative costs.

The packaging fees must also be charged fairly to the producers, to the extent that each individual package must be covered by a packaging fee. It must correspond to the costs the packaging gives rise to, such as e.g. collection and recycling, minus the revenue it contributes to (if any) sold as a raw material. Costs and revenues that are directly attributable to a specific package are therefore charged to that package. Costs (and in exceptional cases income) that are not directly attributable to the specific packaging, for example because the collection takes place jointly for many packages or different OH costs, are distributed according to a thoroughly elaborated model.

The collection of household (and some co-located businesses') packaging waste is managed by the municipalities. The municipalities hand over collected packaging waste to the PROs in relation to each PRO's market share. The market share is decided by the Swedish Environmental Protection Agency based on reporting from the PROs. The costs for the municipalities' collection are then distributed between the PROs based on the same market share. This cost is thus competitively neutral between PROs. This is important as the costs for the municipalities' collection are the single largest cost for a PRO and thus also the single largest part of the packaging fee (for packaging for private use).

### **Costs underlying packaging charges**

The new regulation that entered into force on 1 January this year places new and higher demands on producers with the aim of Sweden reaching the recycling targets. As a producer, you are responsible for financing all the costs of collection and recycling, and the changes that are now being implemented drive large costs. The regulation means, among other things, that the municipalities have taken over the collection responsibility for packaging, and that approximately SEK 1 billion in costs for existing collection close to properties has been moved from municipalities and property owners to producers with producer responsibility. Going forward, the regulation requires the municipalities to gradually expand collection near the property, something that should be available to all Swedish households by 2027.

## The cost breakdown for the parameters that affect our costs

The packaging fees are affected by several different parameters, where the financing of the municipal collection of packaging waste from households constitutes the largest part and accounts for nearly 70 percent of the fees. The remaining 30 percent consists for the most part (to 82 percent) of logistics and recycling costs for the packaging waste we, as a producer responsibility organization, PRO, collect from the municipalities, and the rest consists of costs for treating and recycling collected operational waste.

The possibility for us as a PRO or for you as a producer to influence the costs underlying the fees is therefore very limited, but cost control and optimization are always in focus for us, where it is possible to influence.

## Governance

Näringslivets Producentansvar is owned by the trade associations DLF Sweden, Swedish Food Retailers Federation, Swedish Trade Federation, Swedish Brewers Association and Spirit & Wine Suppliers Association (SVL).

Representatives appointed by the trade associations sit on the board of Näringslivets Producentansvar:

Chairman	Independent – experienced general management, finance, and governance, with strong focus on recycling
Board	DLF Sweden ( x 3 ) Swedish Brewers Association Spirit and Wine Suppliers Swedish Food Retailers ( x 3 ) Swedish Trade Federation

## Collaborations

Collection, transport, handling and sorting – these are all prerequisites for giving the collected household packaging from Sweden’s municipalities a chance to be recycled. As a producer responsibility organisation (PRO), this is a part of our responsibility.

Näringslivets Producentansvar’s collaboration with contractors and partners stems from a solid foundation, built on the well-established infrastructure and previous knowledge of the collection scheme via the Swedish Packaging Collection Service.

## Strategic Partners

Through strategic partnerships with selected facilities for sorting and recycling, we intend to continue driving development towards circular and traceable material recycling.

Näringslivets Producentansvar has a strategic partnership with **Swedish Plastic Recycling**. When you are affiliated to us, your plastic packaging gets the chance to be recycled at their new sorting facility Site Zero – the world’s largest and most advanced plastic recycling facility. With Site Zero, Swedish Plastic Recycling doubles its capacity and triples the number of plastic types it can receive, sort and recycle. In this way, we create the conditions to recycle all of our producers’ plastic packaging and create circular plastic flows.

Glass is one of the materials where circularity is at its best. Näringslivets Producentansvar has a strategic partnership with **Swedish Glass Recycling**, which today recycles over 90 percent of all glass packaging in Sweden. Every weekday, Swedish Glass Recycling receives 900 tonnes of glass packaging at their facility in Hammar, where they sort, crush, and refine the old glass into a new raw material. Together, we work to support the producers in their work to make all glass packaging as recyclable as possible. It starts at the drawing board when designing a product.

## **The development of costs ahead**

Since the majority of the costs that build packaging fees are directly linked to the collection of household packaging and the expansion of property-based collection, we see that the costs will continue to increase in the coming years, when the property-based collection is expanded to reach all households in Sweden. Our forecast shows that the increase will be strong during the years 2025-2027 and then level off. What determines how large the cost increases will be for a single year depends on the expansion rate of collection near the property and will look different for different materials.

## **Why should I as a producer pay a packaging fee?**

Producer responsibility is an obligation according to law. The principle on which producer responsibility is based is called the Polluter Pays Principle (PPP), i.e. the polluter pays. If your company supplies packaging to the Swedish market, you as a producer have a financial responsibility according to law for the packaging to be collected and recycled. Producer responsibility is the basis for the collection and recycling system for packaging in Sweden. The basic idea of producer responsibility is to reduce the amount of waste and ensure that the waste that does occur after all is recycled and used for new products.

## **How are the fees calculated and what affects them?**

The charges are based on the packaging's net cost for collection and processing. The fees are used to reimburse the municipalities for their costs for the collection of packaging waste from households and co-located businesses that have chosen municipal collection, as well as for the municipality's information efforts in accordance with the packaging regulation. The principle is that each type of material must bear its own costs and no cross-subsidization between the types of material must occur. All types of material are handled competitively neutral. Näringslivet's Producer Responsibility does not distribute any profit to its owners - what you pay is used to increase recycling in Sweden.

## **What do you earn from your business?**

We are a not-for-profit business. We do not make any money from the business and do not distribute any profits to our owners.

## **Do I have producer responsibility?**

Your company has producer responsibility if you:

- Fills or otherwise uses a package (to protect, present or facilitate the handling and transport of an item)
- Bring a packaged item into Sweden
- Manufactures packaging in Sweden (service packaging)
- Bring a package into Sweden (service packages)
- From a country other than Sweden sells a packaged item or packaging to an end user in Sweden

## 28. Switzerland

Since Switzerland is not a member of the European Union, it has no legal obligation to follow the EU's packaging regulations. Unlike in neighbouring countries such as France, Swiss legislation does not apply to all packaging: Switzerland does not have a general packaging ordinance.

It does, however, have regulations that apply to certain types of packaging or specific properties. In Switzerland, the Federal Law for the Protection of the Environment, Articles 30 to 30e and 32/32a to the Waste section in particular, as well as the Chemicals Risk Reduction Ordinance, for example, contain some provisions that are relevant for packaging. The most ecologically motivated regulations apply to packaging in the beverage sector (Ordinance on Beverage Containers (VGV). However, there is no provision for dairy products in this ordinance.

<b>Population</b>	8.698 million
<b>No. of local authorities</b>	2148
<b>No. of companies in system</b>	<i>Depends on what type of packaging</i>
<b>Packaging introduced to the market</b>	<i>No reporting on all packaging</i>
<b>Recovered waste</b>	PET-bottles: 36'300 t (recycling quota : 81%) Aluminium packaging : 13'300 t (recycling quota for cans : 94%) Glass packaging : 356'000 t (recycling quota 94%)
<b>Types of packaging</b>	PET bottles, aluminium packaging, glass packaging (other plastic packaging and beverage cartons are only regionally collected and recycled; a national system is currently being set up)

### Packaging organisation/s in Switzerland:



Swiss Recycling is the umbrella organisation for Swiss recycling organisations (i.e. producer responsibility organisations (PRO)) and stands as a competence centre for high quality, transparency and sustainable development at all recycling levels.

Swiss Recycling is positioned as a centre of competence for recycling and the circular economy, does not accept any recyclables itself and does not engage in any trade. The members of Swiss Recycling consist of recycling organisations that are active in separate collection throughout Switzerland. They undertake to implement the standards defined in the Swiss Recycling Charter: These are, in particular, transparency in material and financial flows, optimised take-back and sustainable development.

Swiss Recycling raises awareness of separate collection and recycling through communication work. Recycling conserves resources, saves energy, reduces greenhouse gas emissions and creates secondary raw materials. The correct separate collection is a decisive basis for this.

The umbrella association supports the exchange of experience among members / partners and the realisation of synergies. As an independent non-profit organisation, Swiss Recycling is a competent contact for all questions on the topic of separate collection and recycling.

### System Description

The members of Swiss Recycling are recycling organisations (PROs) active in separate collection throughout Switzerland and have voting rights. Swiss Recycling currently has eight members.

A successful recycling cycle relies on the interaction of multiple players in the value chain. The entire recycling system, including the quality of the recycle, is monitored, operated and financially regulated by a responsible organisation (all members of Swiss Recycling), as follows (for packaging and beyond):

- Ferro-Recycling for sheet steel packaging
- Igora for aluminium packaging
- Inobat for rechargeable and non-rechargeable batteries
- PET-Recycling Schweiz for PET drinks bottles
- SENS for electrical and electronic equipment and lamps
- Swico for electrical and electronic equipment
- VetroSwiss for glass

A system for plastic packaging and beverage cartons is currently being set up as part of the [Sammlung 2025](#) project.

Switzerland has one of the highest volumes of waste per inhabitant in the world. Between 1970 and 2013, an annual waste generation more than doubled from 309 kg to 707 kg per capita. An increase is partly due to our economic growth.

Over the years, however, in addition to producing more and more waste, the Swiss have also become champions of recycling. Currently, 53 percent of municipal waste is recycled in Switzerland. How is recycling financed in Switzerland?

Various waste disposal and financing models are used for recycling systems in Switzerland:

#### **-Tax on Advance Disposal (TSA) for glass and batteries.**

The TSA is prescribed by the federal government for certain wastes (glass beverage bottles, batteries). It is a fee that rests on a legal basis and is levied along with the sales price of a marketed product in order to cover future disposal costs.

The advance disposal fee on glass bottles (TSA) aims to fairly distribute the disposal and recycling costs of used glass according to the principle of causality.

#### **-Upfront Recycling Fee for aluminum, steel tin, and PET beverage bottles (CRA).**

The recycling contribution is a surcharge levied at the level of the manufacturer, importer and trader to cover the financing of the recycling of the product in question. It is based on a voluntary industry agreement and is applied to aluminum and steel can packaging and PET beverage bottles.

Recycling contributions are paid to the trade organization by its members for each bottle sold and discharged from the selling price of beverages.

#### **-Ordinance Concerning the Return, Take-Back and Disposal of Electrical and Electronic Appliances (ORDEA)**

Thanks to the so-called Advance Recycling Fee (ARF), which is paid as early as the purchase of a new electrical or electronic appliance, it is possible in Switzerland to finance eRecycling while respecting competition. At the same time, this makes it possible to ensure eRecycling in a simple and efficient way: used electrical and electronic appliances are taken back by manufacturers, importers, retailers, and collection centers at no extra cost and then fed into the eRecycling circle. In the spring of 2020, it was decided to revise the Ordinance by implementing the principle of “mandatory with possibility of exemption.”

### Actors in the recycling system in Switzerland

In order to function, the recycling cycle requires the interaction of various actors in the value chain. On the one hand, producers and manufacturers must design products and packaging in such a way that they can be recycled. On the other, they must contribute to the financing of the recycling system, mostly by paying upfront contributions on their packaging. The (retail) trade then takes the products to consumers, who in turn must return and recycle the packaging in an environmentally friendly way. From the collection centers (of municipalities, individuals, or retail trade), transporters deliver the recyclable materials to sorting and recycling centers, where they are made available again as high-quality secondary raw materials. The entire recycling system, including quality, is monitored, managed and financially regulated by an organization. It also ensures the participation of the entire industry and compliance with legal requirements. These recycling organizations are the members of Swiss Recycling:

- *FerroRecycling for steel tinsplate packaging*
- *Igora for aluminum packaging*
- *Inobat for batteries*
- *PET-Recycling Switzerland for PET beverage bottles*
- *SENS for electrical and electronic appliances*
- *Swico for electrical and electronic appliances*
- *SLRS for lighting devices*
- *VetroSwiss for glass*

### Recycling systems under ERP Extended Producer Responsibility.

In addition to consumers, manufacturers are also responsible for the environmental impact of products throughout their life cycle. The ERP method makes manufacturers and distributors responsible and thus creates an optimized recycling system.

**The extended producer responsibility** scheme is intended to ensure that producers (incl. importers, traders) also bear responsibility for managing the stage at which the product becomes waste, including separate collection, sorting and treatment operations. It therefore incentivizes producers, when designing their products, to prevent as much as possible and contribute to the reusability and recyclability of materials. Possible measures include, for example, the return of products and subsequent recycling as well as the development of easily recyclable products.

**Extended Producer Responsibility (EPR)** is important for sustainable recycling and the circular economy because it allows coordination of the entire value chain: from distributor to recycler. An essential approach particularly in a circular economy context: the “Design for Recycling,” which ensures the recyclability of products, must be able to rely on the cooperation of the entire value chain. The Circular Economy Platform provides an opportunity to develop a coordinated approach.

Swiss Recycling members are operators of (mostly) voluntary recycling systems, financed by an upfront recycling fee.

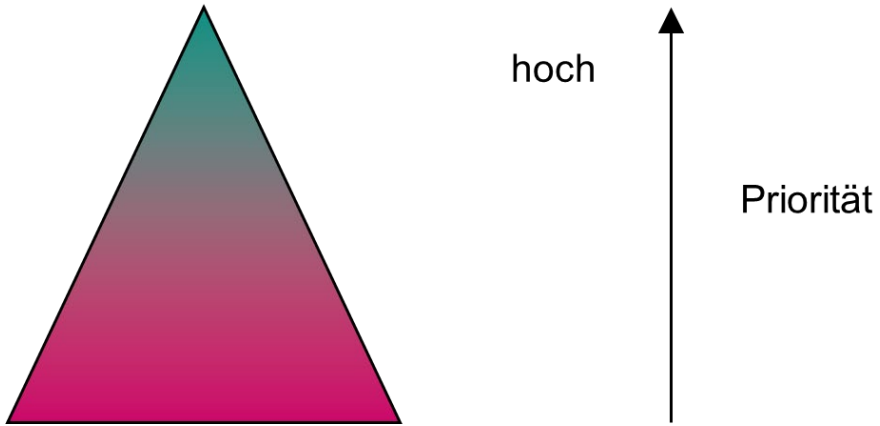
### Prevention

Swiss Recycling has launched the **circular economy platform** to actively implement the circular economy in Switzerland. They are developing new solutions with partners across the entire value chain (from manufacturers to retailers to recyclers) so that packaging and products can be kept in the cycle in the best possible way. Swiss Recycling works with partners on various thematic platforms in order to develop concrete, implementation-oriented solutions; from sector to sector. Swiss Recycling takes into account the full range of circular economy methods: 10 REs, from RE-duce to RE-think – holistically, sustainably, and circularly.

## Waste Hierarchy

The waste hierarchy is a tool used to establish priorities in waste management. The main stages are: prevention – recycling – disposal. The waste hierarchy is often illustrated with a five-stage pyramid:

Prevention – Reuse – Recycling (material) – Recovery (energy, thermal) – Disposal



## 29. Turkey

<b>Population</b>	17,170,178 inhabitants covered by system
<b>No. of companies in system</b>	1,509 contract economic operators
<b>Packaging introduced to the market</b>	2,516,094 tons (2010)
<b>Recovered waste</b>	391,943 tons packaging waste
<b>Types of packaging</b>	Household and commercial

### Legal Basis

The history of the legal perspective of the packaging waste management starts with the Solid Waste Control Regulation (SWCR) in 1991. According to this regulation, there were certain recovery obligations for some sectors. Only the sales packaging of certain products were covered, and paper & board was excluded. In the period of 1991-2005, the covered companies fulfilled their obligations in cooperation with collectors and sorters. There were some obligations, even for the local authorities, but they were not clearly defined. This period may be called as a “voluntary phase” for the local authorities.

The related articles of the SWCR and the 94/62/EC Directive are harmonized and “The Packaging & Packaging Waste Control Regulation” came into force by the beginning of 2005. The new regulation for packaging waste was covering “all packaging”. The obligations for all related parties including the local authorities are clearly defined. In 2005, ÇEVKO was authorized by the Ministry of Environment & Forestry as the recovery organization for packaging waste.

In 24.6.2007, the regulation was revised. The main changes in this revision were the extended period of the recovery rates, the voluntary marking and simplified declaration forms.

On August 24th, 2011 the regulation was revised again. By this revision, some new definitions such as “Supplier” were added. The solution alternatives for packers/fillers/importers are defined as authorized recovery organizations and/or municipalities and/or deposit implementation.

### Packaging organisation/s in Turkey:



ÇEVKO Foundation has been established in 1991, by the 14 leading packaging, detergent and beverage industrial companies of Turkey.

The objective of ÇEVKO is to contribute and play a leading role in the establishment of Packaging Waste Recovery System in Turkey, while complying with the related European Union Legislations and with the Principles of Integrated Waste Management. The Principles of Shared Responsibility among the Consumer, Industry, Local and Central Government are the guiding principles of the activities of ÇEVKO.

### System Description

ÇEVKO Foundation is a non-profit foundation established on November 1, 1991 with the initiatives of 14 leading industrial organizations in Turkey which want to contribute to the establishment of a sustainable recovery

system with the contributions and participation of industry, local authorities and consumers for the economic and regular recovery of packaging wastes in Turkey.

ÇEVKO Foundation is dedicated to developing a sustainable recycling system in Turkey under the leadership of the industry in order to protect the environment and contribute to social development and the economy. ÇEVKO Foundation wants to develop a sustainable recovery system for recyclable waste in Turkey; to assume and fulfill the responsibility of the industry; to contribute to the creation of a modern legal infrastructure for waste management by conveying the views of the industry to all stakeholders; to cooperate with local administrations in order to spread separate collection, separation and recycling practices throughout the country within the framework of the legal infrastructure; to ensure accumulation of knowledge on waste management by taking into account domestic and international practices; to carry out effective promotion, training and information activities to raise environmental awareness; to participate in R&D studies, to provide consultancy and technical support to relevant stakeholders.

In 2003, ÇEVKO Foundation obtained the right to use the international “Green Dot” brand in Turkey, joined the family of recycling organizations using this brand, which is widespread in Europe, and gained the right to represent our country in the European Union.

Starting out with 14 members in 1991, ÇEVKO Foundation was declared an Authorized Institution by the Ministry of Environment and Urbanization within the framework of the “Regulation on the Control of Packaging and Packaging Wastes” published in 2005 during Turkey’s harmonization with the EU. Renewed in 2013, the Authorization Certificate is valid until 2023.

### **Annex 8 Authorization Certificate R**

As an Authorized Institution, between 2005 and 2020, it developed collaborations with local administrations and licensed companies to fulfill the recovery obligations of the marketers it represented and made a significant contribution to the environment and the national economy by ensuring that 7,608,700 tons of packaging waste was collected separately at source. It has played an active role in raising social awareness on the recycling of packaging waste through the training and awareness-raising activities it organizes.

ÇEVKO Foundation adopts the principles of “Integrated Waste Management” in all its activities in line with its founding objectives. It develops projects that prioritize the responsibility sharing of local governments, industry, and consumers with Integrated Waste Management. It also continues to work on Climate Change and Circular Economy.

### **Prevention**

Green Dot was first used in 1990-1991 in Germany as the symbol for determining the kinds of packages eligible for separate collection, called the Green Dot System.

In order to deploy the usage of the Green Dot, “Packaging Recovery Organization Europe – PRO Europe” was established in 1995. PRO Europe, without any profit purposes, grants the right to the recovery system of these countries for utilizing a Green Dot license; that is to one system from each country. The Green Dot has become an international model signifying industrial liability. The Green Dot sign on a Package means that the economic operator launching such packaged product to the market has satisfied its legal liabilities with regard to the recovery of packaging waste.

In 2003 ÇEVKO Foundation obtained the right to utilize the international trademark “Green Dot” in Turkey. ÇEVKO has this trademark utilized by the marketers who would like to use the same in our country by means of executing a sub-license agreement with them.

What you should know about the Green Dot:

- Valid in 31 countries, the majority of which are EU members
- More than 150.000 corporations utilize the Green Dot trademark on their packagings.
- The quantity of packaging on which Green Dot are used has reached 400 billion pieces per year.
- The Green Dot system covers 540 million consumers.

Green Dot is a registered trademark in more than 140 countries.

### Foundation Members

Akcan	Eti	Pinar yasam pinarim
Amway	GCA	Plas
Anadolu Efes	Hatay Indorama	P&G
Avon	Johnson & Johnson	RB
Bakambalaj	Kavaklidere	Red BullRoche
Ball	Kopas Kosmetik	Sarten
Beiersdorf	Koroplast	Savola Foods
Beylerbeyi	Koroza	Super Film
Bunge	Lucien Arkas Baglari	Sutas
Carrefour	L'Oreal	Tamek
Castrol	Marshall	Tat
CCI	Mey   Diego	Tetra Pak
Coca Cola	Migros Ticaret	Tricon
Consus	Mondi	Tuborg
Crown	Netpak	Sisecam
Elif	Olin	uludag
Emek	Papix	Unilever
Erikli	Pepsico	Yatsan

### Governance

Chairman	EDIRNE YAG IND. AND TRADE Inc.
Vice Chairmen	L'OREAL Türkiye COSMETICS SAN. AND TRADE Inc. PROCTER&GAMBLE TÜKTİM MALLARI SAN. Inc. ULUDAĞ BEVERAGE IND. AND TRADE Inc.
Board Members	ANADOLU EFES BREERING AND MALT SANAYİ A.Ş. BALL BEVERAGE TURKEY PACKAGING SAN. AND TRADE Inc. COCA-COLA BEVERAGE INC. CROWN BEVCAN Türkiye AMBALAJ SAN. AND TRADE LTD. ŞTİ. ERİKLİ WATER AND SOFT BEVERAGE IND. TRADE. Inc. INDORAMA VENTURES ADANA PET SAN. Inc. PEPSI COLA SERVICE AND DISTRIBUTION LTD. ŞTİ. PINAR SU IND. AND TRADE Inc. TURK TUBORG BEER AND MALT SAN. Inc. Türkiye BOTTLE AND GLASS FACTORIES. Inc. UNILEVER IND. AND TRADE TÜRK A.Ş.

## International Relations and Memberships

RecyClass



Global Compact  
Network Türkiye

Packaging Recovery Organisation Europe

PRO EUROPE



Exptra

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## 30. Ireland

### Packaging organisation/s in Ireland

Repak is an environmental not-for-profit organisation, with a social mission.

We do not own or manage recycling facilities, or recycle the packaging ourselves as we are a packaging compliance scheme. We do not handle the packaging waste directly but partner with Repak-approved Recovery Operators, Waste Contractors and Local Authorities to collect and recycle waste packaging from households and businesses on behalf of our Members. Our Members fees are used to fund the collection and recycling of household recycling bins, bottle banks, recycling centres (civic amenities) and business packaging waste nationwide.

**Our purpose**, on behalf of our Members, is:

To lead the recycling and sustainability of Ireland's packaging; advocate for a new circular economy; and educate businesses and consumers on reducing and recycling packaging.

Repak was set up in 1997 to help Member businesses meet their legal obligation to recycle the packaging they place on the Irish market. We have over 3,400 Members, whose fees fund household recycling bins, bottle banks, civic amenity sites and business back-door waste nationwide.

At Repak, we are passionate about protecting the environment and reducing the environmental impact of packaging waste, while helping to deliver Ireland's recycling targets for the five main materials\*. We run initiatives and campaigns to help our Members improve the sustainability of their packaging and to encourage consumers to reduce, reuse and recycle better.

### Our Goals

Under our new 10 Year strategy, we have defined primary and secondary goals to help us deliver on our purpose.

#### Primary Goals

1. To make Ireland a Primary Leader in Europe of packaging recycling by 2025 in a circular economy
2. To recycle 50% of all plastic packaging placed on the market by 2025
3. To achieve 80% recycling target for all packaging by 2030 (10% ahead of the EU target)

#### Secondary Goals

- Achieve all material recycling targets
- Achieve target outcomes cost-efficiently
- Have total market participation with regulatory support
- Reduction in plastic placed on the market to be measured by promoting the Plastic Pledge
- Fee structure aligned to recycling targets via eco fee modulation
- Funding framework to be developed by all stakeholders to support the plastic recycling infrastructure in Ireland
- Driving behavioural change

## Material Targets for

<b>Paper</b>	85%
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<b>Plastic</b>	55%
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<b>Glass</b>	90%
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<b>Metals</b>	80%
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<b>Wood</b>	85%
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Recycling Targets displayed in this table refer to 2030 recycling targets for Ireland.

### How we lead

Over the past 20 years, Repak has grown from a ‘compliance scheme’ to a leading environmental organisation that has helped transform the recycling landscape in Ireland, providing credible knowledge and expertise to many stakeholders on packaging waste, while supporting our Members.

Our impact over the last 20+ years

- Repak Members have invested over €587 million to date
- Helping to grow packaging recycling and recovery from under 15% in 1997 to an estimated 95% in 2022
- Exceeding all EU material recycling targets

For many years, we have challenged our Members to increase the sustainability of their packaging, through the following initiatives.

### How we advocate

We represent our Members at Government and EU level on key issues, legislation and policy relating to packaging, packaging waste and the development of sustainable packaging in a circular economy. This includes taking part in consultations with state bodies, local authorities, EU stakeholders, environmental organisations and other European Packaging Compliance Schemes (also known as ‘Extended Producer Responsibility’ schemes), as well as media interviews on packaging recycling and sustainability. Our stakeholders include:

- 3,481 members
- Department of Environment
- 105 Waste collectors
- 35 employees

## How we educate

While keeping our Members informed of EU legislation affecting them and providing guidance on packaging sustainability, we also educate consumers on reducing and recycling through our 'Team Green' campaign, our Team Green for Schools programme and our extensive annual marketing and communications campaigns across traditional and digital media.

## How we behave

We are professional, transparent, honest in our dealings with stakeholders, and always act with integrity and in the best interests of our Members and society as a whole.

As part of our commitment to the highest standards of service to our stakeholders, we have implemented a Management System that meets the requirements of ISO 9001:2015. Our [Quality Policy](#) outlines how we implement continual improvement to drive Membership satisfaction and compliance. Repak Limited operates under approval ([licence](#)) from the Minister for the Environment.

## Plastic Strategy 2030

In September 2018, we launched our Plastic Packaging Recycling Strategy 2018-2030. This report was developed to inform policymakers and recommend actions for stakeholders, including Repak Members. It provides a holistic solution to the plastic waste recycling challenges presented by the Circular Economy Package (CEP), which include plastic recycling targets of 50% by 2025 and 55% by 2030.

The CEP sees a move from the traditional take-make-use-dispose approach of the Linear Economy to a more holistic closed loop approach to material use, where materials are valued and kept in circulation for as long as possible.

## Strategy Development and Recommendations

When developing the strategy, Repak engaged RPS to undertake a review, including stakeholder consultation, to examine how best to achieve the new targets, consulting with 65 different organisations and 81 individuals. The comprehensive document contains 35 recommended actions to deal with the objectives of the CEP strategy for plastics.

It sets out measures that will:

- Help Ireland meet its recycling targets;
- Promote the design and production of plastics and plastic products that optimise use and recycling;
- Support the circular economy; and
- Achieve all of this in a cost-effective manner.

The two-phase plastics strategy prioritises better design of plastics packaging, increased reuse and recycling, advocates for better consumer education and calls for improved data flows and evidence.

Under the first Phase of the strategy, we developed our Repak Members' Plastic Pledge, which now has over 140 Repak Member signatories, pledging to five key objectives.

1. To Prevent – Prioritise the prevention of plastic packaging waste by minimising avoidable single use packaging and promoting packaging reuse where possible.
2. To Support – Support Ireland to deliver the Circular Economy Package plastic recycling targets of 50% of all plastic packaging by 2025 and 55% by 2030, as set by the European Commission.
3. To Simplify – Reduce complexity within the plastic packaging supply chain by simplifying polymer usage and eliminating non-recyclable components in all plastic packaging by 2030.
4. To Increase – Help to build a circular economy for used plastic packaging in Ireland and Europe by increasing the use of plastic packaging with a recycled content.

5. To Avoid – Ensure the reductions of use of plastic packaging do not jeopardise opportunities to achieve Ireland’s goal of a 50% reduction in food waste by 2030, as set out in Ireland’s Food Waste Charter.

## **Our Members and Their Impact**

For over 20 years, Repak Members have funded recycling nationwide, helping to transform the environmental landscape in Ireland.

Who are Repak Members?

Our Members are businesses, large and small, who pay fees to fund the recycling of the packaging they place on the Irish market. We have two categories of members: Regular and Scheduled.

- Regular Members - These are large companies, such as manufacturers, importers, brandholders, distributors and large retailers, who pay annual fees aligned to the volume of packaging they place on the Irish market.
- Scheduled Members - These are small to medium sized business, such as retailers, hotels, pharmacies, pubs and restaurants, who pay a fixed annual fee to fund recycling in Ireland.

How are Repak Members’ fees spent?

Repak Members paid €41.2m in fees in 2022 to directly fund household recycling bins, bottle banks, recycling centres and commercial waste packaging nationwide. For every €1 of Members fees received, 77c is spent on recycling (55c on household recycling and 22c on commercial recycling), 3c on Member fee rebate, 2c on Recovery (Energy from packaging waste), 2c on reprocessing, 2c on Education & Communication and 14c on Repak overheads.

What Repak initiatives do our Members support?

Repak Members play their part in reducing packaging waste and improve recycling behaviour in Ireland. Our Members participate in a range of Repak initiatives designed to improve the sustainability of packaging in Ireland and protecting the environment.

### **Members Benefits**

Repak membership offers cost-effective compliance with EU Packaging Regulations, backed by the full support of Ireland’s leading environmental, not-for-profit organisation, advocating and educating on your behalf.

- Complete compliance - Repak membership ensures full, cost-effective compliance with EU Packaging Regulations, enabling you to fund the recycling of the packaging you place on the market, and contribute to the achievement of Ireland’s recycling targets.
- Leading the way - By joining Repak, you are part of an environmental, not-for-profit organisation, leading the sustainability of packaging in Ireland and educating businesses and consumers on your behalf.
- Advocating for you - As a membership organisation, we represent you at Government and EU level on key issues, legislation and policy, and help you to understand the implications for your business and customers.
- Full team support - Our experienced Membership Team is on hand to answer your questions, guide you through your reporting requirements, and offer advice on improving the sustainability of your business.
- Packaging optimisation and design - Our Prevent & Save Programme, offers free, on-site, packaging optimisation and design surveys to help you reduce packaging and manage your packaging waste to maximise recycling.
- Use of the Green Dot - As a member of Repak, you are entitled to use the EU trademarked Green Dot symbol on your packaging, to indicate that you have contributed financially to the recycling of your packaging.

- The Pakman Awards - The Pakman Awards are Ireland's top National Environmental Awards that recognise excellence in recycling and waste management among businesses, organisations, community groups and individuals in Ireland.
- Promoting your success - Protecting the environment is a team effort. Through our many communications channels and campaigns, we are delighted to give you a platform to promote your sustainability initiatives.
- Use of Repak Conference Centre - Our Members' Training and Conference Centre, located on the ground floor of our Dublin 22 offices, is available for use by Repak members for meetings, conferences, training and away days.

### Why Join Repak

If your business has a turnover of more than €1 million and places more than 10 tonnes of packaging on the Irish market, you have a legal obligation to fund the recycling of that packaging under Irish and EU Packaging Regulations. As a Repak Member your business will be part of transforming the environmental landscape in Ireland and drive behavioural change.

### Governance

As a not-for-profit, member-based organisation, operating under approval of the DECC Repak is committed to best practice corporate governance. The Repak board oversees all aspects of our operation, including strategy, policy and financial management.

Board Members - Our Board includes 6 Repak Member representatives, elected by Repak Members. Elected Directors are appointed for 4 years and may seek re-election.

Chair	Experienced Company Director, Chair and Chief Executive Officer with a demonstrated history of working in the wholesale industry. Strong business development professional skilled in Corporate Governance, Strategic Planning, Negotiation, Sustainability, Food & Beverage and Board Participation.
Board	<p>Musgrave Group – Irish food wholesaler          Centra Bonningtan &amp; SuperValu Hanley's of Rowlagh – Grocery Retailer          Tesco Ireland – grocery retailer          National Plastic Packaging Group Ltd – packaging material and systems          Non-Executive Independent Directors x 3</p> <ul style="list-style-type: none"> <li>- Director of Construction and Procurement at a Development Agency</li> <li>- COO Lidl Ireland</li> <li>- Former tax partner at PwC Ireland</li> </ul>



**MEMBERSHIP INFORMATION PACK**



# Why Repak?

Does my business need to become a member?



- If your business has a turnover greater than €1 million and places over 10 tonnes of packaging onto the Irish market in any calendar year you have a legal obligation under the European Union (Packaging) Regulations (2014).
- If your business is currently under the packaging threshold (less than €1 million and/or under 10 tonnes) but you anticipate this will be exceeded in the coming year, you are required to become compliant.
- The Green Dot trademark is licenced by Repak and you must be a Repak Member to use this symbol on any of your packaging (Ireland only).
- As part of your company's corporate-social responsibility, becoming a Repak Member is an option you should consider.

## THERE ARE TWO TYPES OF REPAK MEMBERSHIP:

### REGULAR MEMBERSHIP

For manufacturers, contract packers, brandholders, importers, distributors and retailers.

Initial joining and yearly re-occurring Membership fees are based on the submission of packaging statistics. (i.e. packaging placed on the Irish market).

### SCHEDULED MEMBERSHIP

For businesses who retail directly to the consumer and do not import or are not brandholders. E.g. independent retailers, pubs, off-licences, pharmacies, hospitality, electrical retailers, restaurants & hardware stores.

Initial joining and yearly re-occurring Membership is a flat fee associated with your turnover with no need to submit packaging statistics.

# How do I join Repak?

If your business has an obligation with the Packaging Regulations — Repak is here to help.

## REGULAR MEMBERSHIP

Repak will provide step by step assistance with the gathering and recording of your businesses packaging returns including:

- Free packaging assessment for your business, to determine how many tonnes are produced each year.
- Free support and guidance throughout the Repak joining process.
- Free expert training on how to report your packaging obligations, conveniently at your business.
- Assistance in completing the initial packaging returns required to join Repak.
- Continuous support with submitting packaging statistics after your business becomes a Repak Member (twice yearly).

## SCHEDULED MEMBERSHIP

Joining is relatively fast and all we require is a completed application form to progress this Membership type.



Apply online  
[www.repak.ie](http://www.repak.ie)



Call our Sales team  
(01) 467 0190



Email our Sales team  
[sales@repak.ie](mailto:sales@repak.ie)



## **Benefits of joining Repak**

9 benefits that cumulatively outweigh the cost of your Membership



- Full cost-effective legal compliance with the Packaging Regulations.
- The complete reporting of packaging returns to Local Authorities and the EPA on your behalf in total confidence.
- Access to our Packaging Technologist who can consult with your business through our Prevent & Save Programme on how to make substantial savings on removing, reducing and managing your packaging output and identifying waste saving opportunities.
- Licenced to use the Green Dot symbol on all your packaged products sold in Ireland.
- The continued benefit of Repak-funded subsidies on the collection of waste from your business' recycling bin.
- Promotion of your company's Green credentials on our website (Member's list), marketing campaigns and nationwide communications.
- Partner with Ireland's only Government approved packaging compliance scheme and leading environmental advocate for business.
- Repak support and lobby on behalf of all our Members with National and European issues.
- Free use of our Members conference centre and meeting room facilities – a location to host Board and staff meetings, training days or conferences.



# Regular Membership

What is Regular Membership and who is it for?

Regular Membership is for companies that place packaging onto the Irish market and fall under one or multiple of the following categories within the packaging supply chain:

## **Material Manufacturer**

Makers or importers of materials to be made into packaging.

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## **Converter**

Makes or imports empty packaging.

.....

## **Brandholder/Importer**

Owners of branded products or importers of packaging items or goods.

.....

## **Distributor**

The first entity to move packaged goods in the Republic of Ireland.

.....

## **Retailer**

Sale of products to the end user (i.e. the customer removes the packaging).

Repak Regular Membership is for producers and legal entities who have an annual turnover greater than €1 million and place more than 10 tonnes of packaging onto the Irish market – deemed to be a ‘Major Producer’.

It covers your business’ legal obligation in accordance with the European Union (Packaging) Regulations (2014).



All you need to do is complete an application form available at **[www.repak.ie](http://www.repak.ie)**

or contact one of our Sales team at **01 467 0190** or **[sales@repak.ie](mailto:sales@repak.ie)**

# Repak Fees 2024

➔ Regular Member fees are calculated based on the amount of different types of packaging placed onto the Irish market at different stages along the packaging supply chain (see fee table below).

Please note that fees for H1 2024 and H2 2024 will be different as listed below.

Packaging type (€/tonne) H1 2024	Materials Manufacturer	Converter	Brandholder / Importer	Retailer	Total per tonne
Recycled Paper / Cardboard	€ 1.00	€ 1.00	€ 36.64	€ 2.00	€ 40.64
Recycled Glass	€ 1.00	€ 1.00	€ 7.71	€ 2.00	€ 11.71
Recycled Alum (Non-DRS)	€ 1.00	€ 1.00	€ 22.64	€ 2.00	€ 26.64
DRS in-scope Alum cans 150ml-3l	€ 0.17	€ 0.17	€ 3.77	€ 0.33	€ 4.44
Recycled Steel (Non-DRS)	€ 1.00	€ 1.00	€ 55.47	€ 2.00	€ 59.47
DRS in-scope Steel cans 150ml-3l	€ 0.17	€ 0.17	€ 9.24	€ 0.33	€ 9.91
Recycled Rigid Plastic	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Recycled Flexible Plastic	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Non Recycled Plastic	€ 1.00	€ 1.00	€ 396.42	€ 2.00	€ 400.42
PET Beverage Bottles	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Other Plastic Beverage Bottles	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Plastic Non Beverage Bottles	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
DRS in-scope PET Bottles 150ml-3l	€ 0.17	€ 0.17	€ 22.48	€ 0.33	€ 23.15
Recycled Wood	€ 1.00	€ 1.00	€ 7.79	€ 2.00	€ 11.79
Recycled Composite	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Non-recycled Comp.	€ 1.00	€ 1.00	€ 396.42	€ 2.00	€ 400.42
Non-Recycled Other	€ 1.00	€ 1.00	€ 209.62	€ 2.00	€ 213.62

Packaging type (€/tonne) H2 2024	Materials Manufacturer	Converter	Brandholder / Importer	Retailer	Total per tonne
Recycled Paper / Cardboard	€ 1.00	€ 1.00	€ 36.64	€ 2.00	€ 40.64
Recycled Glass	€ 1.00	€ 1.00	€ 7.71	€ 2.00	€ 11.71
Recycled Alum (Non-DRS)	€ 1.00	€ 1.00	€ 22.64	€ 2.00	€ 26.64
DRS in-scope Alum cans 150ml-3l	€ -	€ -	€ -	€ -	€ -
Recycled Steel (Non-DRS)	€ 1.00	€ 1.00	€ 55.47	€ 2.00	€ 59.47
DRS in-scope Steel cans 150ml-3l	€ -	€ -	€ -	€ -	€ -
Recycled Rigid Plastic	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Recycled Flexible Plastic	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Non Recycled Plastic	€ 1.00	€ 1.00	€ 396.42	€ 2.00	€ 400.42
PET Beverage Bottles	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Other Plastic Beverage Bottles	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Plastic Non Beverage Bottles	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
DRS in-scope PET Bottles 150ml-3l	€ -	€ -	€ -	€ -	€ -
Recycled Wood	€ 1.00	€ 1.00	€ 7.79	€ 2.00	€ 11.79
Recycled Composite	€ 1.00	€ 1.00	€ 134.89	€ 2.00	€ 138.89
Non-recycled Comp.	€ 1.00	€ 1.00	€ 396.42	€ 2.00	€ 400.42
Non-Recycled Other	€ 1.00	€ 1.00	€ 209.62	€ 2.00	€ 213.62

- Businesses are required to determine the weights of packaging they handle or supply. Repak is here to help, guide and support every 'Major Producer' along the way.
- If your business has been trading for longer than one year it is liable for back fees.
- Repak has two methods for businesses joining as Regular Members:
  - **STANDARD JOINING PROCESS**  
Full compliance after the submission of up-to-date packaging statistics and when invoices are paid in full.
  - **FAST TRACK PROCESS**  
Compliance achieved at the start of the process through the payment of an initial joining fee. Full compliance is then provided after the submission of up-to-date packaging statistics and when invoices are paid in full. This option is available at Repak's discretion and is subject to terms and con

## Packaging Statistics & Training

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When joining Repak it may be the first time that your business has compiled an expert service that can support your business every step of the way.

Repak can support your business in the following ways:

- **COMPLIMENTARY PACKAGING AUDIT**  
Repak can conduct an audit to see if your business has an obligation with the Packaging Regulations - at no cost.
- **FREE STATISTICAL TRAINING**  
Provision of free training at your premises to calculate the quantity of packaging your business places on the Irish market. Training will be provided within two weeks of submitting an application form and is usually divided into two components; the first is a broad overview of the Regulations; the second is tailored information relevant to your business.
- **FIRST COMPLETED PACKAGING RETURNS**  
Repak can submit your business' initial Packaging Returns at no charge, making it straightforward to become a Repak Member.
- **YEARLY PACKAGING STATISTICS**  
Once you have joined Repak, we can provide details of approved consultants that can be employed by your company to help in the collation and provision of on-going, yearly packaging statistics. Statistics are required bi-yearly; February (July to December the previous year) and August (January to June of the current year).

**For further information or to book training, please contact our Sales team on 01 4670190 or email [sales@repak.ie](mailto:sales@repak.ie)**



# Regular Membership Checklist

Once completed the following questions can help guide Repak's understanding about your company's obligation under the packaging regulations.

→ **Describe your main business and products**

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→ **Do you have any other businesses? What % of turnover does this account for?**

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→ **Do you contract pack for a 3rd party in ROI?**

E.g. is there any brand you pack goods into where you don't own the brand name?

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→ **Does any 3rd party in ROI contract pack for you?**

E.g. is there any company in ROI that packs product under your brand name?

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→ **Number and type of premises you use in ROI**

E.g. warehouse, office, manufacturing facility, shop, 3rd party warehouse etc.

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→ **How do you pack product?**

What types of packaging materials do you handle?

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→ **What material types are:      Used at Your Back-door      Sent to Your Customer**

Paper/Cardboard	<input type="radio"/>	<input type="radio"/>
Glass	<input type="radio"/>	<input type="radio"/>
Aluminium	<input type="radio"/>	<input type="radio"/>
Steel	<input type="radio"/>	<input type="radio"/>
Plastic	<input type="radio"/>	<input type="radio"/>
Plastic Bottles	<input type="radio"/>	<input type="radio"/>
Wood	<input type="radio"/>	<input type="radio"/>
Paper/Plastic Comp	<input type="radio"/>	<input type="radio"/>
Metal Comp	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>

→ **Do you buy packaging to pack your products?**

- Yes, we apply packaging to all our products
- We pack what we manufacture but we also buy in and sell on pre-packed goods
- We don't pack anything. Everything we sell was packaged by a previous owner

→ **Do you sell /supply any products with no packaging?**

- No, all our products are sold packaged
- Yes, all (you must place >10 tonnes of packaging on the ROI market to be obligated)
- Yes, some product is sold with no packaging but some product has packaging

→ **Is your 'product' packaging? Do you make packaging?**

- None of our product is packaging
- All our product is packaging
- Some of our product is packaging, we manufacture packaging
- Some of our product is packaging, we buy packaging to sell on as a product
- Not sure if our product is packaging or not

→ **Do you invoice customers in:**

- ROI only
- Northern Ireland, UK, Europe, etc.
- Both

→ **Do any of your customers remove packaging and return it to you for you to reuse?**

- Yes
- No

→ **What raw materials would you use? How are they packaged?**

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→ **Do you return any packaging to your suppliers?**

- Yes to suppliers in ROI
- Yes to suppliers in other countries

→ **Do you have packaging waste arising on your premises?**

i.e. Back-door packaging waste

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→ **Who is your waste contractor?**

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## Other Helpful Information:

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→ **Departments/Personnel that may have useful information when collecting packaging information.**

Accounts, Buying/Purchasing, Sales, Distribution, Packaging, Production, Warehouse/General Manager, etc.

→ **You will need packaging weights.**

Preferably these should be on an individual basis, but if you have a large product range you may group products and assign a packaging weight to each group. Items should only be grouped together if they have similar packaging. Weights may be obtained from suppliers or you can weigh the packaging yourself.

→ **You will need to multiply the packaging weights by 'usage'.**

This can be based on sales, purchases, production figures - whatever provides the most accurate information.

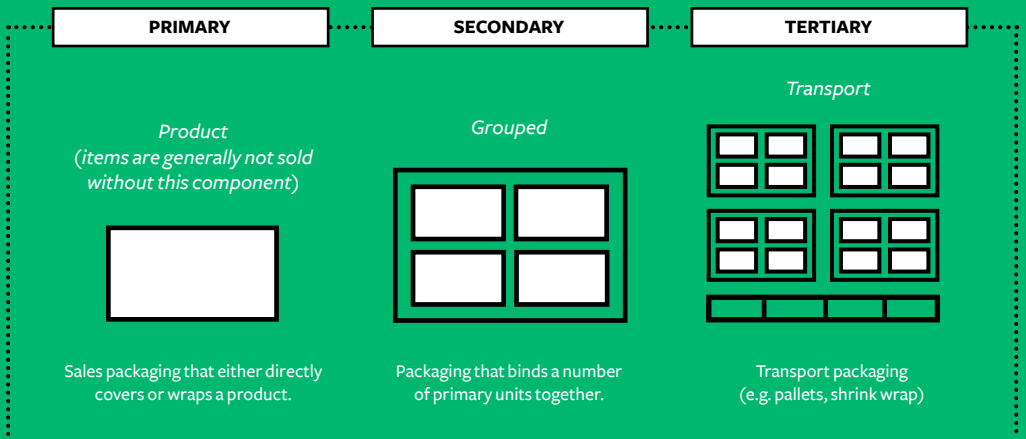


# General Packaging Information

## → What is deemed to be Packaging placed onto the Irish market?

Packaging is material used for the containment, transport, handling, protection, marketing or sale of an item. It also includes all packaging consumed on a business premises.

## → Packaging can be divided into three main components:



## → How is packaging waste measured?

Packaging tonnes can be calculated based on production or sales figures. Packaging should be recorded in grams (1,000,000 grams in a metric tonne). Packaging weights should be recorded separately for each material type. Exports and production waste are currently not included as part of the Packaging Regulations.

## → What are some examples of Packaging?

Pallets, shrink wrap, crates, drums, cartons, strapping, bottles, caps, packets, cans, lids, tubes, bags, containers, trays, baskets, bowls, boxes, cards, clips, hangers, jars, netting, pots, punnets, sachets, tins, tubs, labels etc.



## FAQs

### → **Does my business need to join Repak?**

Repak is a packaging compliance scheme set-up by IBEC and approved by Government. If your business is over the packaging threshold (i.e. >€1 million turnover and places over 10 tonnes of packaging onto the Irish market) you are deemed to be a 'Major Producer' and have an obligation under the European Union (Packaging) Regulations (2014) and must comply. Repak is here to help you.

### → **How do I know if I am placing >10 tonnes of packaging onto the market?**

The amount of tonnes your business places on the Irish market will need to be determined through an audit. Repak can help you make this assessment. If your business is a retailer or pharmacy and requires Scheduled Membership you can use one of our packaging calculators to understand the tonnage of all goods sold. If your business is in hospitality (pub, restaurant or hotel) all the products consumed on-site are included in your obligation, with glass the largest component contributing towards weight. Glass tonnage data can be requested from your recovery operator to see if your business is over 10 tonnes.

### → **Why do I have to become compliant when I already pay for my waste and recycling?**

Even though your business pays for your back-door waste to be collected by your recovery operator, the legislation relates to packaging sold via your front door. Packaging placed onto the Irish market in this way requires collection and processing and the Regulations place this responsibility with the producer.

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## → **What does Repak do with the Membership fees?**

Repak invests Membership fees into waste collection and the recycling of packaging materials including paper, plastic, cardboard, wood, aluminum and steel. Every recycling bin in Ireland is subsidised by Repak along with funding provided for every public and private bottle bank.

## → **How do I know which Membership I need?**

If you are a pub, restaurant, hotel or an independent retailer (including hardware, electrical, off licence or pharmacy) and your business is neither a brandholder nor importer, you qualify for Scheduled Membership. If your business manufactures, imports or has branded packaging then you are a Regular Member. This includes contract packers. The best way to confirm your Membership type is by speaking to one of our Sales team.

## → **How much does it cost to be a Repak member?**

This depends on the type and amount of packaging your business places on the Irish Market which also determines which Repak Membership (Scheduled or Regular) is most appropriate. Costs can vary and it is best to speak to a member of our Sales team to help determine a realistic estimate.

## → **How do I join Repak?**

If your business is obligated and qualifies for our Scheduled Membership, joining Repak is as easy as completing and submitting an application form. Regular Membership is a little more complicated because packaging statistics are required, although submission of an application will kick-start this process. Repak has a Regular Member 'fast track' route that can help speed up Membership considerably. Please ask one of our Sales team about this option.

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→ **What do I get for the cost of joining Repak?**

First and foremost, if your business has an obligation and is a 'Major Producer' you will become legally compliant with the Packaging Regulations. However, we have many other additional benefits associated with becoming a Repak Member which are detailed in our supporting literature and on our website.

→ **What are back fees and why do I have to pay them?**

Back fees exist in the interest of fairness to make a non-compliant business accountable for the years that their obligation was not met. Existing Repak Members have been funding their packaging obligation for many years. Their membership fees have in turn subsidised businesses with an obligation that have made no contribution (deemed 'free-riders'). This imbalance provides a financial advantage gained over competitors that have complied with the legislation. Potentially, up to six years back fees can be charged.

→ **What will happen if I am obligated and don't become compliant?**

If you are a 'Major Producer' and have an obligation under the European Union (Packaging) Regulations (2014) you are required by law to become compliant. If your business avoids compliance this will come to the attention of Local Authorities who are the enforcers of the legislation and have the power to prosecute.



# Prevent & Save

A free packaging waste prevention service provided to all Repak Members under the Packaging Waste Prevention Programme.

Whether you are a Regular or Scheduled Member, the Prevent & Save programme is dedicated to assisting your business to optimise their packaging and save you money.



For more information on any of the services available under our Prevent & Save service contact our team:

**[preventandsave@repak.ie](mailto:preventandsave@repak.ie)**

or **01 467 0190**

**[www.repak.ie](http://www.repak.ie)**

## **The benefits of packaging optimisation to your business are numerous.**

### **By optimising your packaging you could:**

.....

Review your portfolio to ensure your packaging is designed for circularity / recycling.

.....

Reduce the amount of packaging placed onto the Irish market or discarded as back door waste.

.....

Reduce the cost and time associated with packaging waste management at your premises.

.....

Reduce your Repak Membership fees by optimising for eco-modulated fees.

.....

Reduce energy consumption and costs when packing your products.

.....

Find an opportunity to innovate by using more environmentally friendly or lighter weight packaging materials.

## → **Why Prevent & Save?**

By optimising packaging, you can prevent or minimise the use of unnecessary packaging during the manufacture, transport and sale of your products. This ‘stop waste before it happens’ approach helps to reduce waste management costs as you place less packaging onto the Irish market.

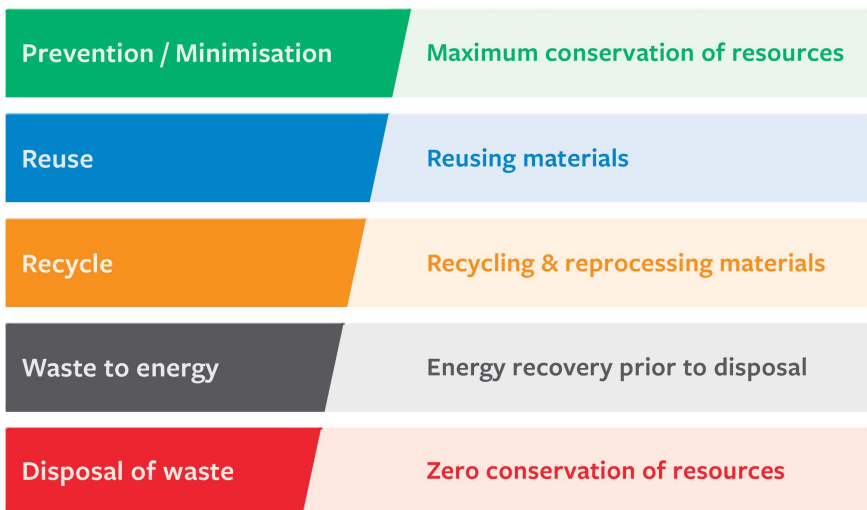
As part of the service, a member of our Packaging Technology team can visit your site to carry out a Prevent and Save Survey where we look at packaging coming into and out of your business. After the survey we will provide you with a detailed technical and confidential report that guides you through reduction opportunities identified during the visit.

Where waste cannot be avoided, our packaging technology team can also advise your business on how to segregate waste effectively, which can further reduce waste management costs at your site.

## → **How can Repak Members save through packaging waste prevention opportunities?**

In line with the Waste Hierarchy, Repak’s focus through these surveys is to assist Member companies to make their packaging systems as efficient as possible, giving the maximum packaging benefit, for the minimum environmental impact.

This focus on efficient packaging should also lead to material cost reductions, transport cost reductions and other efficiency savings.



# Repak Stakeholders

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## → **Repak Members**

Repak has over 3,400 participating Member companies who provide funding for the recycling of packaging that is placed on the Irish market.

## → **Department of Environment, Communications and Climate (DECC)**

The Government is responsible for the implementation of the European Union (Packaging) Regulations (2014) and subsequently provides Repak its licence to help make businesses compliant.

## → **Recovery Operators**

Repak provides recycling funding to approximately 105 licensed recovery operators to support the collection and management of domestic and commercial packaging waste. The majority of these are affiliated with the Irish Waste Management Association (IWMA).

## → **Enforcement**

### → **Local Authorities (LAs)**

Enforcement responsibility of the Packaging Regulations lies with Local Authorities.

### → **Waste Enforcement Regional Lead Authorities (WERLAs)**

WERLAs co-ordinate regional waste enforcement actions and efforts between LAs.

## → **The Environmental Protection Agency**

Repak report waste recycling and recovered packaging tonnes directly to the EPA who are responsible for Irelands reporting to the European Union.

## → **Industry Representative groups (e.g.)**

- IBEC
- RGDATA
- Convenience Stores & Newsagents Association (CSNA)
- Retail Ireland
- Restaurant Association of Ireland
- Irish Hotel Federation
- Green Hospitality
- Hardware Association Ireland
- National Off-Licence Association
- Licensed Vintners Association
- Vintners' Federation of Ireland
- Irish Pharmacy Union

## → **Origin Green**

A sustainability programme that enables Ireland's farmers and producers to set and achieve measurable sustainability targets. Major Producers must become compliant with Repak before they are awarded Origin Green status.



# Enforcement of the Regulations

Local Authorities are responsible for enforcing the packaging regulations. If a business is over the packaging threshold (a turnover greater than €1 million and placing over 10 tonnes of packaging onto the Irish market) and it is deemed a 'Major Producer', they must comply with the European Union (Packaging) Regulations (2014) by law.

In 2017 the Department for Communications, Climate Action and the Environment (DCCA) put in place new structure to assist with enforcement of waste regulations and has had an immediate impact.

The formation of co-ordinated enforcement through the three Waste Enforcement Regional Lead Authorities (WERLA) has assisted Local Authorities in the pursuit of businesses that are breaking the law. Repak works closely with the WERLAs in supporting compliance of the regulations.



connacht-ulster  
waste region



southern  
waste region



eastern - midlands  
waste region

Failure to comply can result in businesses being taken to court by a relevant Local Authority and prosecuted. It is now difficult for businesses to avoid their obligation in relation to the Packaging Regulations.

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**REPAK**



# Scheduled Membership

What is scheduled membership and who is it for?

**Repak Scheduled Membership is for Major Producers who have an annual turnover greater than €1 Million and place more than 10 tonnes of packaging onto the Irish market.**



All you need to do is complete an application form available at [www.repak.ie](http://www.repak.ie)

or contact one of our Sales team at **01 467 0190** or [sales@repak.ie](mailto:sales@repak.ie)

Scheduled Membership is designed to help small to medium sized companies by removing the administrative work of recording all packaging materials and weights, unlike Repak Regular Membership. Instead, a yearly fee is paid. However, businesses cannot be manufacturers or importers of products to avail of this Membership type.

Scheduled Membership covers your business' legal obligation in accordance with the European Union (Packaging) Regulations (2014).

If a company has multiple businesses at different locations meeting the threshold, each of these can join independently under each relevant category. This saves considerable time by not having to report packaging statistics for all business activities.

To renew Membership, a flat fee payment is required once a year based on audited turnover. A notice is sent out by Repak each January. Repak's Scheduled Member fee structure is referenced in this pack.

# What types of businesses fall under Scheduled Membership?

There are eight broad Scheduled Membership categories:

## → **Independent Retailers**

Includes convenience stores and franchises that sell packaged items to the customer (including paper and plastic carrier bags).

## → **Hotels**

All packaged goods consumed on-site at the point of sale, including those sold in restaurants, bars or complimentary items left in a hotel room e.g. shampoo bottles, snacks and bottled beverages.

## → **Restaurants**

Bottled wine, beer or water sold and/or consumed on-site. Take-away boxes and bags, all count towards a business' packaging obligation.

## → **Licensed Premises**

Public houses or bars, including beverages sold at theatres, stadiums and sports clubs. This includes all glass and plastic bottles, cans and packaged food sold.

## → **Off-Licences**

Every glass or plastic bottle or can of beer, wine or mixer, along with all packaged food and carrier bags, are considered front door packaging waste.

## → **Pharmacy**

All independent pharmacies and franchisees. Every packaged item sold, including medicine (blister pack, bottles, tubes, aerosol cans and cardboard boxes).

## → **Hardware Stores**

These can be defined by four sub-categories; hardware/DIY stores, building material suppliers, household and gardening centres and agricultural/feed sales, including any packaged item sold, from paints to compost bags to boxed or wrapped tools etc.

## → **Electrical Retailers**

Cardboard boxes, plastic wrapping and polystyrene protection surrounding every electric item is considered front-door packaging waste and counts towards a packaging obligation. Also included is packaging removed from larger items (e.g. washing machines, fridges etc.) at the point of sale.

## 2024 Scheduled Members Fees - VAT Rate 23%

**NOTE: ALL SCHEDULED MEMBERS ARE REQUIRED TO SUPPLY AN AUDITORS DECLARATION**

Sub Class	Band	Sector Description & Annual Packaging Tonnage Placed on Market	Turnover From €	Turnover up to and over €	Scheduled Fee €	VAT	Total inc. Vat @23%
1	17	<b>Hardware and Building MR</b> (10 - 25 tonnes )	1,000,000	3,649,999	402.00	92.46	494.46
1	1	<b>Hardware and Building MR</b> (Over 25 tonnes )	3,650,000	Over 3,650,000	986.00	226.78	1212.78
2	17	<b>Hospitality</b> (10 - 25 tonnes )	1,000,000	-	402.00	92.46	494.46
2	1	<b>Hospitality</b> (Over 25 tonnes )	1,000,000	Over 1,000,000	986.00	226.78	1212.78
3	17	<b>Pharmacy</b> (10 - 25 tonnes)	1,000,000	-	402.00	92.46	494.46
3	1	<b>Pharmacy</b> (Over 25 tonnes)	1,000,000	Over 1,000,000	986.00	226.78	1212.78
4	17	<b>Licensed Premises</b> (10 - 25 tonnes)	1,000,000	-	402.00	92.46	494.46
4	1	<b>Licensed Premises</b> (Over 25 tonnes)	1,000,000	Over 1,000,000	986.00	226.78	1212.78
5	17	<b>Independent Retailer</b> (10 - 25 tonnes)	1,000,000	-	402.00	92.46	494.46
5	1	<b>Independent Retailer</b> (Over 25 tonnes)	1,000,000	3,809,999	986.00	226.78	1212.78
	2		3,810,000	4,439,999	1,084.00	249.32	1333.32
	3		4,440,000	5,079,999	1,280.00	294.4	1574.40
	4		5,080,000	5,719,999	1,478.00	339.94	1817.94
	5		5,720,000	6,349,999	1,577.00	362.71	1939.71
	6		6,350,000	6,989,999	1,774.00	408.02	2182.02
	7		6,990,000	7,619,999	1,971.00	453.33	2424.33
	8		7,620,000	8,249,999	2,169.00	498.87	2667.87
	9		8,250,000	8,879,999	2,366.00	544.18	2910.18
	10		8,880,000	9,519,999	2,465.00	566.95	3031.95
	11		9,520,000	10,159,999	2,662.00	612.26	3274.26
	12		10,160,000	10,799,999	2,760.00	634.8	3394.80
	13		10,800,000	11,429,999	2,957.00	680.11	3637.11
	14		11,430,000	12,059,999	3,156.00	725.88	3881.88
	15		12,060,000	12,699,999	3,253.00	748.19	4001.19
	16		12,700,000	Over 12,700,000	3,451.00	793.73	4244.73
6	1	<b>Off Licence</b> (All over 25 tonnes)	1,000,000	3,809,999	986.00	226.78	1212.78
	2		3,810,000	4,439,999	1,084.00	249.32	1333.32
	3		4,440,000	5,079,999	1,280.00	294.4	1574.40
	4		5,080,000	5,719,999	1,478.00	339.94	1817.94
	5		5,720,000	6,349,999	1,577.00	362.71	1939.71
	6		6,350,000	6,989,999	1,774.00	408.02	2182.02
	7		6,990,000	7,619,999	1,971.00	453.33	2424.33
	8		7,620,000	8,249,999	2,169.00	498.87	2667.87
	9		8,250,000	8,879,999	2,366.00	544.18	2910.18
	10		8,880,000	9,519,999	2,465.00	566.95	3031.95
	11		9,520,000	10,159,999	2,662.00	612.26	3274.26
	12		10,160,000	10,799,999	2,760.00	634.8	3394.80
	13		10,800,000	11,429,999	2,957.00	680.11	3637.11
	14		11,430,000	12,059,999	3,156.00	725.88	3881.88
	15		12,060,000	12,699,999	3,253.00	748.19	4001.19
	16		12,700,000	Over 12,700,000	3,451.00	793.73	4244.73
7	17	<b>Electrical Retailers</b> (10-25 tonnes)	1,000,000	3,499,000	402.00	92.46	494.46
7	1	<b>Electrical Retailers</b> (Over 25 tonnes)	3,500,000	Over 3,500,000	986.00	226.78	1212.78
8	17	<b>Restaurant</b> (10-25 tonnes)	1,000,000	-	402.00	92.46	494.46
8	1	<b>Restaurant</b> (Over 25 tonnes)	1,000,000	Over 1,000,000	986.00	226.78	1212.78

## Packaging and Non-Packaging List - Version 1, July '23

PACKAGING DESCRIPTION: Packaging shall mean all products made of any materials of any nature to be used for the containment, protection, preservation, handling, delivery, informing and presenting of goods.		Sector/ Category	Packaging	Non Packaging
1	Rolls, tubes, cylinders and cores on which a material is wound (e.g. sellotape, sticky paper, plastic film, aluminium, foil, wrapping paper, tissue paper, greaseproof paper) except rolls, tubes and cylinders intended as parts of production machinery and not used to present a product as a sales unit	Other/Miscellaneous	✓	
2	Bag - Designed and intended to be filled at the point of sale	Retail/Hospitality	✓	
3	Bag for Life	Retail/Hospitality	✓	
4	Bag for sandwich, bread, etc. - Intended to fill at point of sale	Retail/Hospitality	✓	
5	Bag around cooked chicken - filled at point of sale	Retail/Hospitality	✓	
6	Individual bag of rice	Retail/Hospitality	✓	
7	Tea bag	Retail/Hospitality		X
8	Roasting bags - where sold empty to be filled by consumer	Retail/Hospitality		X
9	Plate/containers for food - Intended to be filled at point of sale	Retail/Hospitality	✓	
10	Disposable filled beverage cup, distributed via vending machines	Retail/Hospitality	✓	
11	Disposable beverage cups	Retail/Hospitality	✓	
12	Reusable cup	Retail/Hospitality		X
13	Ceramic/glass packaging, sold with contents at time e.g. pâté/yoghurt/desert	Retail/Hospitality	✓	
14	Disposable cutlery	Retail/Hospitality		X
15	Cutlery/stirrer/spatula/straw - sold with product or food	Retail/Hospitality		X
16	Sleeve/wrapper containing cutlery/stirrer/spatula/straw/chopstick	Retail/Hospitality	✓	
17	Device for measuring dosage in a container	Retail/Hospitality		X
18	Device for measuring dosage which forms part of the container closure	Cleaning/Maintenance/Hospitality	✓	
19	Lollipop stick and frisko stick	Retail/Hospitality		X
20	Disposable bottle which is sold filled with the product	Retail/Hospitality	✓	
21	Novelty packaging for food, e.g. feeding bottle containing sweets	Retail/Hospitality	✓	
22	Sweets wrapped in a toy (the toy has an ancillary function)	Retail/Hospitality	✓	
23	Sweet boxes	Retail/Hospitality	✓	
24	Decorative tin, e.g. for biscuits, tea, alcohol, etc.	Retail/Hospitality	✓	
25	Beverage system capsules/pods (e.g. coffee, chocolate, milk) which end up empty after use	Retail/Hospitality	✓	
26	Beverage system coffee capsules/foil pouches/filter paper/coffee pods - Disposed of together with the used coffee product	Retail/Hospitality		X
27	Stuffed artificial shell, e.g. scallop shell	Retail/Hospitality	✓	
28	Empty artificial shell	Retail/Hospitality		X
29	Natural shell (from actual shellfish)	Retail/Hospitality		X
30	Aluminum foil and clingfilm used as service packaging - Designed and intended to be filled at the point of sale	Retail/Hospitality	✓	
31	Filled gift basket, e.g. special beer basket	Retail/Hospitality	✓	
32	Promotional paper on drinks tray	Retail/Hospitality		X
33	Sausage skin	Retail/Hospitality		X
34	Small molds for cakes or pastries sold with the cake/pastry	Retail/Hospitality	✓	
35	Cake doilies sold with a cake	Other/Miscellaneous	✓	
36	Cake doilies sold without a cake	Other/Miscellaneous		X
37	Spike for a skewer	Retail/Hospitality		X
38	Paper placemat	Retail/Hospitality		X
39	Paper placemat on tray	Retail/Hospitality		X
40	Woodwool e.g. used as fill packaging in hampers	Retail/Hospitality	✓	
41	Screw cap	Cleaning/Maintenance	✓	
42	Soluble bag for detergents	Cleaning/Maintenance		X

## Packaging and Non-Packaging List - Version 1, July '23

PACKAGING DESCRIPTION: Packaging shall mean all products made of any materials of any nature to be used for the containment, protection, preservation, handling, delivery, informing and presenting of goods.	Sector/ Category	Packaging	Non Packaging
43	Bottle (decorated) of perfume	Body Care/Cosmetics	✓
44	Sample of perfume, cream, etc.	Body Care/Cosmetics	✓
45	Brush from a tube of mascara, which forms part of the closure attached to the packaging	Body Care/Cosmetics	✓
46	Brush from a tube of mascara, not attached to the packaging	Body Care/Cosmetics	X
47	Brush from a tube of lipstick, which forms part of the closure attached to the packaging	Body Care/Cosmetics	✓
48	Brush from a tube of lipstick, not attached to the packaging	Body Care/Cosmetics	X
49	Small sponge to spread the foundation	Body Care/Cosmetics	X
50	Holder/Container for a tube of lipstick	Body Care/Cosmetics	✓
51	Wrapper paper of sanitary towels	Body Care/Cosmetics	✓
52	Toothpaste tubes	Body Care/Cosmetics	✓
53	Mirrors (not removable) in compact make-up sets	Body Care/Cosmetics	✓
54	Mirrors (removable) in compact make-up sets	Body Care/Cosmetics	X
55	Make up tools i.e. brushes and sponges	Body Care/Cosmetics	X
56	Tester cards for perfumes	Body Care/Cosmetics	X
57	Tester vials / bottles with attached card	Body Care/Cosmetics	✓
58	Glass bottles for injection solutions	Pharma/Medical Devices	✓
59	Non-consumable capsules, e.g. ampoules in glass	Pharma/Medical Devices	✓
60	Syringe sold filled	Pharma/Medical Devices	✓
61	Empty syringe	Pharma/Medical Devices	X
62	Syringe needle	Pharma/Medical Devices	X
63	Tampon applicator	Pharma/Medical Devices	X
64	Cream applicator	Pharma/Medical Devices	X
65	Measuring spoon	Pharma/Medical Devices	X
66	Consumable capsules (medicine)	Pharma/Medical Devices	X
67	Inhaler with integrated canister containing medicine	Pharma/Medical Devices	✓
68	Separate canister for inhaler	Pharma/Medical Devices	✓
69	Inhaler housing without canister	Pharma/Medical Devices	X
70	Patient Information Leaflet	Pharma/Medical Devices	X
71	Dropper pipette part of the cap	Pharma/Medical Devices	✓
72	Dropper pipette not part of the package	Pharma/Medical Devices	X
73	Systems for sterile barriers (pouches, trays and other material necessary to preserve the sterility of the product)	Pharma/Medical Devices	✓
74	First aid kit	Pharma/Medical Devices	X
75	Trays (for commercialisation)	Horticulture/Garden	✓
76	Wrapping around plant roots e.g. peat pots, jute nets, etc.	Horticulture/Garden	✓
77	Packaging films	Horticulture/Garden	✓
78	Covers	Horticulture/Garden	✓
79	Flower pots intended to accompany the plant throughout its life	Horticulture/Garden	X
80	Flower pots- intended for the sale & transport of plants and not intended to accompany the plant throughout its life	Horticulture/Garden	✓
81	Flowerpots used during production process, but which are no longer around the plant when it is put on the market	Horticulture/Garden	X
82	Decorative/terracotta pots	Horticulture/Garden	X
83	Cable reels (domestic), e.g. extension cord on permanent reel and garden hose on permanent reel	Tools/Equipment/DIY	X
84	Single-use cable reels for electrical wire, etc. (on sale in DIY stores and others)	Tools/Equipment/DIY	✓
85	Reusable industrial hose reels for road works	Tools/Equipment/DIY	X
86	Sales packaging for tools, drills, etc., e.g. cardboard box	Tools/Equipment/DIY	✓

## Packaging and Non-Packaging List - Version 1, July '23

PACKAGING DESCRIPTION: Packaging shall mean all products made of any materials of any nature to be used for the containment, protection, preservation, handling, delivery, informing and presenting of goods.		Sector/ Category	Packaging	Non Packaging
87	Tool box sold filled, device box, etc.	Tools/Equipment/DIY		X
88	Staples, pins, clips, bobbins	Clothing/Shoes/Textiles/Accessories	✓	
89	Clothes hangers - sold with a clothing item	Clothing/Shoes/Textiles/Accessories	✓	
90	Clothes hangers - sold separately	Clothing/Shoes/Textiles/Accessories		X
91	Support element in a luxury shoe, intended for several uses	Clothing/Shoes/Textiles/Accessories		X
92	Support element in a luxury shoe, intended for single use	Clothing/Shoes/Textiles/Accessories	✓	
93	Packaging given during dry cleaning	Clothing/Shoes/Textiles/Accessories	✓	
94	Tag or label inside the garment	Clothing/Shoes/Textiles/Accessories		X
95	Label attached directly to or attached to a product	Clothing/Shoes/Textiles/Accessories	✓	
96	Bag around a sleeping bag intended to keep the sleeping bag therein	Clothing/Shoes/Textiles/Accessories		X
97	Bag in which a tent and its various parts are kept together	Clothing/Shoes/Textiles/Accessories		X
98	Plastic foil for cleaned clothes in laundries - if designed and intended to be filled at the point of sale	Clothing/Shoes/Textiles/Accessories	✓	
99	Paper label on a bag	Clothing/Shoes/Textiles/Accessories	✓	
100	Suit cover	Clothing/Shoes/Textiles/Accessories		X
101	Case for electric razor	Appliances/Accessories		X
102	Disposable camera	Appliances/Accessories		X
103	Photo film cartridge	Appliances/Accessories		X
104	Wrap around photo sleeves	Appliances/Accessories	✓	
105	Plastic case for film or camera roll	Appliances/Accessories	✓	
106	Camera case	Appliances/Accessories		X
107	Case that contains photos and negatives	Appliances/Accessories	✓	
108	Box or sleeve for CD, DVD, Blu-Ray, cassette, video, etc.	Multimedia		X
109	Bell for CDs sold empty, to be used as storage	Multimedia		X
110	CD cover sold with CDs, not intended for storage DVDs, etc.	Multimedia	✓	
111	Film around a CD case of videos, cassettes, DVDS etc.	Multimedia	✓	
112	CD spindles (sold with CDs, not intended to be used as storage)	Multimedia	✓	
113	CD spindles (sold empty, intended to be used as storage)	Multimedia		X
114	Toner refill for printer or photocopier, e.g. plastic bottle	Multimedia	✓	
115	Disposable toner for printer or copier (with electronic component)	Multimedia		X
116	Cartridges for printers	Multimedia		X
117	Label affixed to the machine (PC, etc.) but which cannot be removed, e.g. serial number	Multimedia		X
118	Explanatory note	Multimedia		X
119	Disposable gas cylinders for household use, e.g. camping gas	Interior Design & Accessories	✓	
120	Refillable steel and composite gas cylinders (except fire extinguishers)	Interior Design & Accessories	✓	
121	Fire extinguishers	Interior Design & Accessories		X
122	Metal cages for transportation	Interior Design & Accessories	✓	
123	Wooden element supporting furniture (similar to a pallet)	Interior Design & Accessories	✓	
124	Cassette, box, cardboard box to deliver cutlery	Interior Design & Accessories	✓	
125	Cassette/box for storing cutlery, silver, medals, jewellery	Interior Design & Accessories		X
126	Candle within glass jar	Interior Design & Accessories	✓	
127	Lid of candle jar	Interior Design & Accessories	✓	
128	Diffuser bottle + sticks	Interior Design & Accessories		X
129	Grave side lights/lantern	Other/Miscellaneous		X

## Packaging and Non-Packaging List - Version 1, July '23

PACKAGING DESCRIPTION: Packaging shall mean all products made of any materials of any nature to be used for the containment, protection, preservation, handling, delivery, informing and presenting of goods.	Sector/ Category	Packaging	Non Packaging
130 Board Games box, puzzle box, etc.	Games/Toys		X
131 Wedgings of a model kit	Games/Toys	✓	
132 Play-doh tubs	Games/Toys	✓	
133 Chest for storing blocks	Games/Toys		X
134 Envelopes for products/goods for sale/supply of marketing material	Publishing/Postal/Stationery/Marketing	✓	
135 Padded envelopes (bubble wrap inner)	Publishing/Postal/Stationery/Marketing	✓	
136 Envelopes containing letters/invoices etc.	Publishing/Postal/Stationery/Marketing		X
137 Normal envelopes used by individuals or companies to send mail	Publishing/Postal/Stationery/Marketing		X
138 Mailing pouches for catalogues and magazines (with a magazine inside)	Publishing/Postal/Stationery/Marketing	✓	
139 Parcel post sent by individuals	Publishing/Postal/Stationery/Marketing		X
140 Packaging used for sending products by hand/following a purchase by mail order/internet (Contains the product)	Publishing/Postal/Stationery/Marketing	✓	
141 Packaging of periodicals, regional press, publications, printed advertising and other printed matter (exception of printed matter explicitly included in this list), mailed even if these prints are mailed.	Publishing/Postal/Stationery/Marketing	✓	
142 Packaging for directories	Publishing/Postal/Stationery/Marketing	✓	
143 Labels	Publishing/Postal/Stationery/Marketing	✓	
144 Stamps	Publishing/Postal/Stationery/Marketing		X
145 Backing paper or booklet for stamps, labels, stickers	Publishing/Postal/Stationery/Marketing	✓	
146 Leaflets (if Marketing/Promotional Material only)	Publishing/Postal/Stationery/Marketing	✓	
147 Leaflet or Manual (if informational/instruction purposes)	Publishing/Postal/Stationery/Marketing		X
148 Current account & prize bonds leaflets containing application form	Publishing/Postal/Stationery/Marketing		X
149 Current account & prize bonds leaflets without application form	Publishing/Postal/Stationery/Marketing	✓	
150 Gift card or Voucher card	Publishing/Postal/Stationery/Marketing		X
151 Backing/mounting/envelope/leaflet/booklet for Gift or Voucher card	Publishing/Postal/Stationery/Marketing	✓	
152 TV Licence / Childrens Saving stamp books	Publishing/Postal/Stationery/Marketing		X
153 Submissions or forms from authorities (e.g. info on referendum)	Publishing/Postal/Stationery/Marketing		X
154 Cover page for sending to an addressee	Publishing/Postal/Stationery/Marketing		X
155 Box for drawing articles, sold filled, e.g. aluminum box for colored pencils	Publishing/Postal/Stationery/Marketing	✓	
156 Disposable dispenser for unrolling and tearing sticky paper / sellotape	Publishing/Postal/Stationery/Marketing		X
157 Packaging of glue, corrector in a tube or bottle (plus possibly the brush in the cap)	Publishing/Postal/Stationery/Marketing	✓	
158 Paint container, water-based paint box, etc.	Publishing/Postal/Stationery/Marketing	✓	
159 Disposable refill for fountain pen, ballpoint pen, pen, etc.	Publishing/Postal/Stationery/Marketing	✓	
160 Pen, pencil and mechanical pencil	Publishing/Postal/Stationery/Marketing		X
161 Wood on a Pencil	Publishing/Postal/Stationery/Marketing		X
162 Moisture absorbing element in a packaging system	Other/Miscellaneous	✓	
163 Moisture-absorbing element that is not in a packaging system	Other/Miscellaneous		X
164 Gift wrap sold separately	Other/Miscellaneous		X
165 Gift wrap used to package product	Other/Miscellaneous	✓	
166 Gift boxes	Other/Miscellaneous	✓	
167 Free sample packaging, given when providing services eg Repairs for shoes, watch, clothing alterations, etc.	Other/Miscellaneous	✓	
168 Matchbox	Other/Miscellaneous	✓	
169 Discount voucher/coupon	Other/Miscellaneous		X
170 Lighter	Other/Miscellaneous		X
171 Labels hung directly or attached to a product	Other/Miscellaneous	✓	
172 Plastic film around packaging	Other/Miscellaneous	✓	

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173	RFID Radio Frequency Identification/RFID Tags	Other/Miscellaneous		X
174	Widget	Other/Miscellaneous	✓	
175	Coal / Cement bags	Other/Miscellaneous	✓	
176	Tape	Other/Miscellaneous	✓	
177	Wax layers around cheese	Other/Miscellaneous		X
178	Paper baking cases (sold empty)	Other/Miscellaneous		X
179	Cardboard display units for marketing/promotional purposes	Other/Miscellaneous	✓	
180	Plastic sleeves (e.g. on a bottle)	Other/Miscellaneous	✓	
181	Mechanical quern (integrated in a non-refillable recipient, filled with a product, e.g. pepper mill filled with pepper)	Other/Miscellaneous	✓	
182	Mechanical quern (integrated in a refillable recipient, e.g. refillable pepper mill)	Other/Miscellaneous		X

*This document does not purport to be and should not be considered a legal interpretation of the legislation referred to herein*